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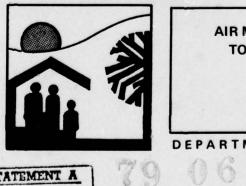


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Environmental Impact Analysis Process



AIR MOBILE FINAL SUPPLEMENT TO FINAL ENVIRONMENTAL IMPACT STATEMENT

MX: MILESTONE II
MARCH 1979

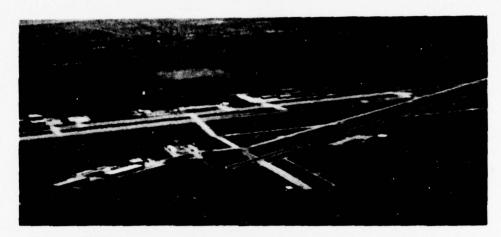
DEPARTMENT OF THE AIR FORCE

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14. MONITORING AGENCY NAME & ADDRESS(H different from Controlling Office) 15. SECURITY CLASS. (of this report) AFSC-TR-79-85-VOL-2 Unclassified 15a. DECLASSIFICATION/DOWNGRADING 16. DISTRIBUTION STATEMENT (of this Report) Approved for public release; distribution unlimited 17. DISTRIBUTION STATEMENT (of the abstract entered in Block 20, If different from Report) MX: Milestone II. Air Mobile, Volume Final Supplement to Final Environmental Impact Statement, 18. SUPPLEMENTARY NOTES 19. KEY WORDS (Continue on reverse side if necessary and identify by block number) MX Milestone II Air Mobile Basing 20. ABSTRACT (Continue on reverse side if necessary and identify by block number) The Final Supplement provides additional environmental data and analysis of the MX air mobile alternative. It has been published as an addendum to Volume I, Draft Supplement (AD-A670229).

Air Mobile







Environmental Impact Analysis Process



AIR MOBILE FINAL SUPPLEMENT TO FINAL ENVIRONMENTAL IMPACT STATEMENT

MX: MILESTONE II

MARCH 1979

DEPARTMENT OF THE AIR FORCE

PREFACE

This document has been published as an addendum to the Draft Supplement filed on February 16, 1979. The Final Supplement consists of the Draft and this addendum.

Following a Defense System Acquisition Review Council (DSARC) meeting held on 5 December 1978 to consider MX Full-Scale Engineering Development (FSED), the Air Force was directed to perform further analyses of an air mobile basing concept. This Supplement provides the environmental analyses of that concept as part of the comparison with Multiple Protective Structure (MPS) concepts presented at the December DSARC meeting.

When the program enters FSED, the Air Force will develop a system that meets operational requirements at acceptable cost and schedule; perform sufficient flight testing so that the system can proceed into the next phase, namely, production and deployment, with minimal risks; and analyze system-related environmental concerns and develop appropriate mitigative measures. The FSED decision does not include selection of deployment areas or bases for the operational missile, nor does it provide for production of final operational equipment.

Development of a concept is an evolutionary process. The Draft Supplement was based on a range of system parameters representative of the air mobile concept. The Final Supplement has been refined in light of public comments and continuing Air Force efforts to meet requirements at the lowest acceptable cost.

The MX FSED program is planned to take about 5 years. During this time the Air Force will conduct an environmental program that includes the preparation of Environmental Impact Statements (EIS's) in addition to the Milestone II Final EIS and this Supplement. These additional EISs will reflect progress made during FSED and provide additional opportunities for public review and comment.

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GENERAL SUMMARY FINAL AIR MOBILE SUPPLEMENT TO FINAL ENVIRONMENTAL IMPACT STATEMENT MX:MILESTONE II (ADMINISTRATIVE ACTION)

This Final Air Mobile Supplement to the Final Environmental Impact Statement (FEIS) for MX:Milestone II was prepared by the United States Air Force.

BACKGROUND

The United States Air Force has previously prepared and issued Draft (10 July 1978) and Final (6 October 1978) Environmental Impact Statements addressing the environmental consequences of Full-Scale Engineering Development (FSED) and the Basing Mode Decision for a new Intercontinental Ballistic Missile (ICBM) known as MX. The MX system is to be more survivable than present ICBM systems. Achievement of this survivability will require both a new, more capable missile, and deployment in a different way than is used for the existing missile force. Currently, missiles are emplaced in buried concrete structures (silos), with one missile each. These missiles are becoming increasingly vulnerable with increases in the numbers and accuracy of the weapons that can be used against them.

The MX:Milestone II Environmental Impact Statement (EIS) addressed the potential environmental consequences of development and procurement of a number of full-scale prototype missiles and missile carriers, and of a series of tests associated with these prototypes. This action is known as Full-Scale Engineering Development (FSED), and the decision to proceed with this development phase is known as the Milestone II decision. The FSED decision does not include selection of deployment areas or bases for the operational missile, nor does it provide for production of final operational equipment. Those decisions, if made, require additional environmental impact statements.

The MX:Milestone II EIS also addressed the comparative environmental effects of four survivable basing modes for the missile systems, and of variants on those modes. These were known as buried trenches, vertical shelters, horizontal shelters, and pools; all provided for ground transportation of the missiles among multiple protective structures (MPS). For the MPS modes, missile survivability is provided by location uncertainty. This uncertainty is achieved by randomly locating a small number of missiles throughout a large number of protective structures and moving the missiles occasionally.

The Basing Mode Evaluation Volume (Volume IV) of the Final EIS very briefly included as possible alternative concepts two air mobile options which under previous studies had been found to be less suitable than the four candidate basing modes for MX mentioned above.

Subsequently, it was decided that additional consideration be given to air mobile at the Milestone II decision point for MX. This Supplement provides additional environmental data and analysis of the air mobile

alternative. The Final Supplement, in conjunction with the MX:Milestone II FEIS, provides the environmental information necessary for consideration of this broader choice among basing options.

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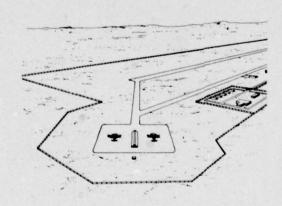
Persons or organizations who wish to obtain a copy of the Draft Supplement, this document, or the MX: Milestone II FEIS, may do so by writing or calling:

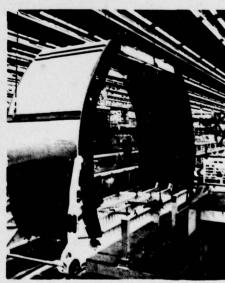
Civil Engineering Division SAMSO/MNND Norton AFB, CA 92409 Telephone Number (714) 382-6891

This document has been published as an addendum to the Draft Supplement filed on February 16, 1979. The Final Supplement consists of the Draft and this addendum. This addendum was filed with the Environmental Protection Agency and made available to the public in March 1979.

Program Overview







I. PROGRAM OVERVIEW

1.1 INTRODUCTION

This chapter describes the concept of operations for the air mobile ICBM alternative. Volume I of the MX:Milestone II FEIS addressed key ICBM and environmental issues and effects for MPS systems. This material has consequently not been duplicated for the Draft Supplement or this addendum.

1.2 THE AIR MOBILE CONCEPT

The Air Mobile ICBM concept as presently conceived consists of the following elements:

- o Aircraft capable of transporting and air launching ICBMs
- o Missiles similar to those described in the MX: Milestone II FEIS
- o A structure of air bases and landing sites to support the system and provide for survivable operation during wartime operations
- o. Ground beacons to provide position and velocity information to the aircraft and the missile guidance systems
- o Command, control, and communications systems (C3) required for positive, reliable, and responsive operation

Survivability against surprise attack is achieved by basing the aircraft in such a way that they have sufficient time to escape if an attack is sensed. Survivability against an anticipated attack or extended survival after an attack is achieved through random movement of the aircraft among a large number of dispersal sites. An aircraft landing at such a site moves to another site before it can be detected and attacked. Aircraft carrying fully operational missiles would fly only when an actual attack had occurred or the system was significantly threatened. This is the present practice with the strategic bomber force.

Three levels of operations are envisioned under the air mobile concept, the first two of which are involved directly in routine peacetime operations:

- Main operating bases (MOBs) provide support for assigned personnel and associated weapon system equipment
- o Alert bases provide support for alert aircraft and personnel
- o Primary and secondary dispersal sites provide unmanned locations for aircraft survival under advanced alert or post-attack conditions

Existing military bases would be used for the main operating bases and alert bases to the maximum feasible extent. Alert bases are visualized as being "austere," with the minimum necessary facilities, and with few permanently assigned personnel. Personnel would be cycled from the associated MOB. Co-use of civilian airfields for alert bases will also be considered.

There are two types of dispersal sites: primary and secondary. This is a change from the concept described in the Draft Supplement, in which aircraft stationed at up to 70 alert bases would scatter to thousands of dispersal sites when threatened.

The new concept envisions approximately 40 alert bases, with two or more aircraft at each. If the aircraft at the alert bases are threatened (e.g., by submarines in coastal waters), they would deploy first to approximately 100 primary dispersal sites located in the central United States. This dispersal would increase the survivability of the system by spreading the force over a larger area and minimizing the time required to get the force aloft if attacked (by reducing the number of aircraft at each site).

If the strategic situation worsened further, the aircraft would scatter once more to several thousand secondary dispersal sites located throughout the entire United States. Secondary dispersal sites would include existing airfields of all types with various levels of support facilities, or other locations (e.g., dry lake beds with no facilities) that could be adopted for the purpose. Stationing the aircraft at secondary dispersal sites would further increase system survivability by providing locational uncertainty. If the United States were attacked, the aircraft would take off from the alert bases, primary dispersal sites, or secondary dispersal sites (depending on their alert status) and stand ready to launch their missiles.

To achieve the desired degree of missile accuracy, a ground beacon system (GBS) would be used to provide positional data to the missile guidance system. The global positioning system (GPS), a satellite system, will provide positional data worldwide. Both the GBS and the GPS would be available for use by commercial and general aviation.

A positive command, control, and communications (C^3) system will be required to assure that the status of all system elements can be monitored, that the missiles can be retargeted on command, and that the missiles can be launched only on orders from the President.

1.3 SYSTEM ELEMENTS

Aircraft (1.3.1)

Two types of aircraft are being considered for air mobile ICBM use:

- Modified Advanced Medium Short Takeoff and Landing Transports (AMSTs)
- o Modified "Wide-Bodied Jet" (WBJ) transport aircraft

Use of an AMST type of aircraft with short takeoff and landing (STOL) features would permit operations at a large number of dispersal sites without the need to make physical improvements at the dispersal sites. The number of AMST aircraft will be established in FSED. In this Air Mobile Supplement, manufacture of an estimated 300-350 AMST type aircraft was assumed. Suitable aircraft could be developed through modification of existing YC-14 (Boeing) or YC-15 (McDonnell Douglas) prototypes.

Use of a wide-bodied jet, which does not have the same STOL features as the AMST, would reduce the number of available dispersal sites. WBJs require an increased runway length for operations compared with STOL type aircraft. Because of the larger WBJ payload compared to that of the AMST, fewer WBJ aircraft and potentially fewer alert bases would be required. Manufacture of an estimated 150-175 WBJ type aircraft of the Boeing 747 or Lockheed C-5 type was assumed in this environmental analysis.

Candidate Missiles (1.3.2)

Missiles under consideration for the air launch mode are generally similar to those described in the MX: Milestone II FEIS. All use solid propellant rocket motors, a post-boost vehicle, a guidance and control system, and a deployment module for mounting and dispensing the reentry vehicles (RVs), or warheads.

The missiles under consideration vary within the following ranges:

- o Diameter: 69, 83, 92 inch (175, 210, 235 cm)
- o Length: 50 to 60 ft (15 to 18 m)
- o Weight: 60,000 to 160,000 lb (27,000 to 72,600 kg)
- o Stages: 2 or 3

Elements of the 83-inch-diameter missiles could be common with those of a new missile for use in U.S. Navy Trident missile submarines. The degree of "commonality" would range from one or two booster stages, to "fully common," including the guidance system.

Basing Requirements (1.3.3)

From five to eight MOBs will likely be required, depending on the type of aircraft selected and the final scale of deployment. MOBs must be close enough to alert bases for efficient operation. The MOBs will provide facilities for missile, aircraft, and personnel support.

The alert bases provide limited support of two or more aircraft in a ready posture. The actual number of bases will be established during FSED. Alert personnel would rotate from associated MOBs.

Alert bases would be located to provide for survival, public safety, and minimum impact on cultural resources. Criteria used in making the preliminary alert base analysis are:

- o Approximately 700 nm (1,300 km) from coastal waters
- Excluded areas: national parks and monuments, wilderness areas;
 Indian reservations; existing ICBM installations; areas over 5,000 ft
 (1,500 m) altitude
- o 60 nm (110 km) minimum distance between bases

o Distances from inhabited buildings, traveled public highways and passenger railroads as required by explosives safety criteria

These criteria differ somewhat from those listed in the Draft
Supplement. The distance from population concentration of given sizes has
not yet been applied to the process being used to identify potential alert
base sites. Whether the earlier criteria (which were the same as those used
for preliminary siting of the multiple protective structure alternative) will
be applied to refinement of alert basing studies will be decided during FSED.

To ensure survival from a submarine-launched ballistic missile (SLBM) attack, a standoff distance of approximately 700 nm (1,300 km) from coastal waters is desirable to allow adequate warning time for aircraft to safely escape from their alert bases. Dependent on economic considerations, threat analyses, and availability of suitable existing airfields, the primary study area may be enlarged as indicated by Figure 1-1.

Typical facilities for an alert base are listed in Table 1-1. FSED would include studies to minimize the facilities required.

Table 1-1. Typical alert base facilities.

Heated Storage for Snow Removal, Maintenance Equipment (where necessary)
Maintenance Dock
Intrusion Detection Equipment
Underground Fuel Supplies
Control Tower
Tactical Air Navigation

Most personnel at an alert base would rotate from the MOB. This requires transient dormitory and messing facilities on base, but no family housing or extensive support facilities. The possibility of using local civilians for some functions to reduce operating costs will also be studied in FSED.

An alert base is expected to require approximately 2 mi² (5 km²) of land, varying with the type and number of aircraft accommodated, and the final design features.

The military exclusion area required for the alert aircraft and associated structures (within a double fence) is about 0.14 nm². The joint use area (generally speaking the runway and the rest of the base) requires an area of about 1.12 nm². The easement area required by quantity distance safety criteria (which prohibit inhabited structures but allow for other uses) is about 0.64 nm². The total number of alert bases is to be determined during FSED, but current estimates range from 30 to 40. The number will depend primarily on the type of aircraft and missile selected, the number of reentry vehicles per missile, the number of missiles per aircraft, the cost of the system, and the projected threat. As noted, these will be existing, preferably military, airfields to the maximum extent possible. The feasibility of operating the system with no alert bases may

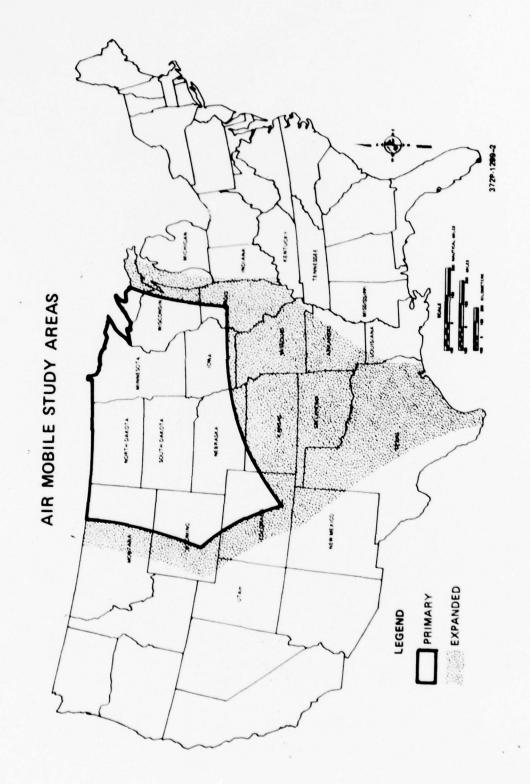


Figure 1-1. Air mobile study areas.

also be considered during FSED.

Ground Beacon System (1.3.4)

Ground beacons would be spaced at approximately 60 nm (110 km) intervals; wherever feasible they would be co-located with the VOR/TACAN stations of the federal airways. Approximately 700 to 1,200 beacons will be necessary. Beacons would require from a few hundred square feet to, at most, a few thousand square feet (tenths of acres) for each installation. The beacon system would be available for civilian use.

Command, Control, and Communications (C3) (1.3.5)

A command, control, and communications (C³) network is required for the system to provide rapid, continuous, and survivable command and control among SAC Command and Control Centers, National Military Command System elements, and the key elements of the system. Maximum use will be made of existing system elements. Details of the C³ system will be resolved during FSED.

1.4 PERSONNEL REQUIREMENTS AND COSTS

Personnel requirements and costs will vary with the scale of deployment, the type of aircraft and missile selected, and the final "mix" of alert base type and location selected, and other factors which will be examined in detail during FSED. "Best estimates" for a nominal system have consequently been used in the environmental analysis. These estimates are summarized in Table 1-2.

Total costs for production, deployment, and operation of the systems were not available for environmental analysis. The environmental implications of these factors were considered as an unresolved issue in Chapter IV (Basing Mode Evaluation) of the Draft Supplement.

1.5 RESOURCES REQUIRED

Resources required for system construction and operation include construction materials for facilities; materials required for production of other system elements (e.g., aircraft, missiles, electronic equipment); dollars and manpower for production of system elements, and for system operation; water, petroleum, oil, and lubricants (POL); and electrical energy. The principal resources required for construction of ground facilities are labor, cement, asphalt, steel, water, and electrical power. A wide variety of materials is used in the fabrication of aircraft and ICBMs.

1.6 FULL-SCALE ENGINEERING DEVELOPMENT (FSED)

The preceding sections described the air mobile ICBM system as it would be deployed, and bear only on basing mode selection. Actual production and deployment of the system would follow a Milestone III decision, approximately five years after initiation of FSED, that is, about 1983. The elements of FSED, the action currently under consideration, are summarized below.

Table 1-2. Estimated "Nominal System" phased labor and cost requirements per site

ELEMENT	WORKERS	MAN YEARS	1977 DOLLARS
CONSTRUCTION PHASE			
Main Operating Base	650-900	1300-1800	\$150-200 million
Alert Base			
Co-Use Military	60-70	60-70	\$7 million
Co-Use Civilian	60-80	60-80	\$9 million
New	150-170	150-170	\$18 million
Primary and Secondary Dispersal Sites	Minimal	Minimal	To be determined
OFERATIONS PHASE			
Main Operating Base*	3,500-6,000		Not available
Alert Base	90~130		Not available
Primary and Secondary Dispersal Sites	Intermittent inspection/maintenance		

*Includes personnel on rotational assignments to alert base, while at MOB.

The FSED decision point in a system acquisition program is referred to as Milestone II. At this milestone, the Defense Systems Acquisition Review Council (DSARC) is to reaffirm the need for the program and assess the cost and schedule limitations. This review results in recommendations to the Secretary of Defense. The following major issues will be considered in the Milestone II decision:

- o Which of the alternative missiles should be used for a survivable ICBM force?
- o Which basing mode concept should enter into FSED?
 - A multiple protective structures alternative
 - An air mobile alternative
- o What are the technical, cost, and environmental risks?

The FSED phase for the air mobile ICBM alternative, if approved, would require approximately five years. Nationwide expenditures ranging from \$5 billion to \$7 billion were used for analysis in this Supplement and in the FEIS. While national expenditures do not differ significantly for air mobile or MPS FSED, regional impacts do differ and were addressed in Chapter II of the Draft Supplement.

Proceeding into FSED of an air mobile system would require the following types of activities:

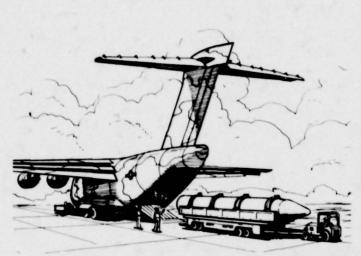
o Continuing systems-level studies and program management

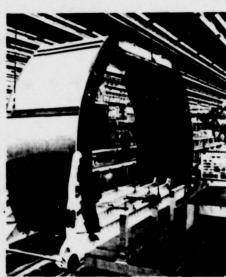
- o Missile development, prototype fabrication, and testing
- o Aircraft modification, prototype fabrication, and testing
- o Ground beacon system development, prototype fabrication, and testing
- Development, prototype fabrication, and testing of all associated C³
 and other required electronics equipment
- o Aircraft flight testing and qualification
- o Missile flight testing, both on the ground and in the air launch mode
- o Selection of the sites for MOBs, alert bases, and dispersal sites (a separate EIS would be prepared in connection with this site selection process)
- o Design of the facilities required for MOBs, alert bases, and dispersal sites
- o Gathering cost, technical, and environmental data (for reaching a future production and deployment decision)

Note that an implementation of the decision by the Secretary of Defense at Milestones II and III requires:

- o Initial approval by the Executive Branch of the government through the budget process
- o Approval by Congress through the appropriations process (including appropriate hearings and debate)
- o Final approval by the President

Full-Scale Engineering Development





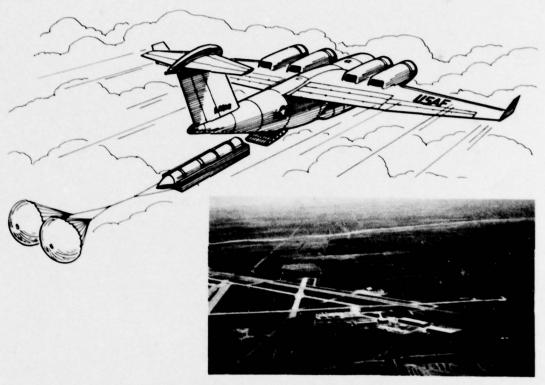


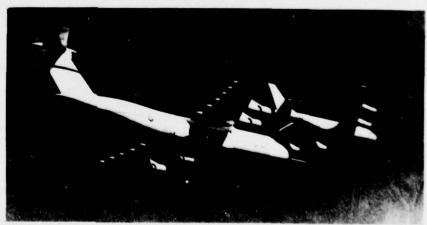
I. FULL-SCALE ENGINEERING DEVELOPMENT

The following text changes apply to Chapter II of the Draft Supplement. (Minor typographical changes have not been included.)

PAGE	COMMENT
II-iii	First paragraph, last line, change "million" to "billion."
II-24	Paragraph 3.3.3.2.4, line 4, change "40 percent" to "4 percent"
II-29	Section 6, change "LAND" to "LOCAL."

III Missile Flight Testing





III. MISSILE AND AIRCRAFT FLIGHT TESTING

TEXT ADDITION

This section examines an optional test plan for Missile Assembly and Missile Flight Testing at Vandenberg AFB. In general, the Missile Assembly and Flight Testing is described in Volume III of the MX: Milestone II FEIS and Chapter III of the Air Mobile Draft Supplement to this document. Present plans call for approximately 26 missile flight tests of which 6 may be ground launches.

This optional test plan provides facilities at VAFB for missile assembly and launch. The facilities are described in Volume III of the FEIS for the vertical shelter option and include:

- o Rail Transfer Facility
- o Mechanical Maintenance Facility
- o Integrated Test Facility
- o Missile Assembly Building
- o Payload Assembly Building
- o Stage Processing Facility
- o Stage Storage Pads
- o Stage IV Processing Facility
- o Vertical Shelter (Launch Facility)
- o Roadway(s)

Additional requirements to support the air launch phase may include:

- o Mate-Demate Facility This facility will be provided for the purposes of final attachment of the test re-entry system to the MX booster stages to bring the system to launch ready status.
- Alert Maintenance Facility This facility will consist of crew quarters, systems monitoring functions and minor aircraft maintenance capabilities to support tests of system readiness.
- Roadway Modification Existing roadways will be utilized to the extent possible.
- Taxiway/Apron Modification Minor parking apron additions would be required to support aircraft.

Aircraft testing would remain at Edwards AFB, CA. If this optional test plan at Vandenberg AFB is chosen, the Missile Assembly Facility at

Hill AFB, UT or at Edwards AFB, CA would not be required for the flight test program.

Construction costs and related environmental effects will be essentially the same as described in Volume III of the MX: Milestone II FEIS. The new facilities will be sited in a manner to minimize archaeological and biological impacts. Operational impacts are not significantly different from those described in the FEIS and Supplement.

ERRATA

The following text changes apply to Chapter III of the Draft Supplement. (Minor typographical changes have not been included.)

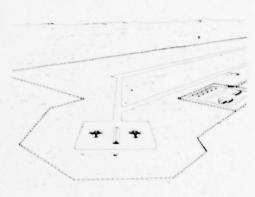
PAGE	COMMENT
III-iii	Paragraph 2, change the first sentence to read "Approximately 26 missile flight tests" and change the third sentence to "Six ground launches"
111-1	Paragraph 1, second sentence, change (Wbjs) to (WBJs).
	Paragraph 2, sentence 2, change from "three ground launches" to "approximately six ground launches."
III-3	Paragraph I, line 3, change to read "Plans call for" instead of "Plans for call."
	Paragraph 3, last sentence, delete "The first."
111-5	Section 1.2.2, first sentence, "301,000 area" should read "301,000 acres" and "Air Force Systems Command."
III-12	First line, "4-7 percent" should read "4.7 percent."
III-23	Delete second sentence in Section 1.2.3.3.
III-29	Section 2.1.3, third sentence, should read "The second is the possible construction"
III-35	Section 3.1.2.1.1, second sentence, change to read "There may be six ground launches"
III-36	Section 3.1.2.2, first paragraph, second sentence, change to "Approximately six"
111-37	Section 3.2.1.2, second line, "not the protected" should read "nor the protected."
111-38	Section 3.2.1.3.2 second paragraph, last line "and ers is expected" should read "no importation of workers is expected."
III-43	Section 3.2.2.3.6, last line, change "nd" to "education."

111-47

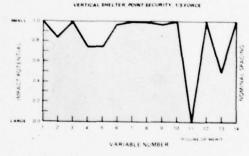
Section 6, first paragraph, last sentence should read "it will maintain Vandenberg, Edwards, and Hill as significant contributors to the local economic base."

IV Basing Mode Evaluation





MPACT PROFILE - MPS OPTION CALIFORNIA MOJAVE



IV. BASING MODE COMPARISON

The following text changes apply to Chapter IV of the Draft Supplement. (Minor typographical changes have not been included.)

PAGE

COMMENT

IV-4

Table 1-2, cited in paragraph 3, was inadvertently omitted from the text and is reproduced below.

Table 1-2. General characteristics of provinces which are wholly or partially in the air mobile study area.

MAJOR DIVISIONS	PROVINCES	CHARACTERISTICS
Interior Plains	Central Lowland Great Plains Province	Vast plain, 500 to 2,000 ft, the agricultural heart of the continent Western extension of the Central Lowland rising from 2,000 to 5,000 ft; semiarid
Canadian Shield	Superior Upland	An upland with elevations up to 2,000 ft, but without much local relief; drainage irregular; many lakes, extends far north in Canada around both sides of Hudson Bay
Atlantic Plain	Coastal Plain	Broad plain rising inland; shores mostly sandy beaches backed by estuaries and marshes; mud flats at south of Mississippi River; inland ridges parallel the coast; elevations less than 500 ft

IV-5	The exclusion areas around cities (in orange) should be deleted from the figure.
IV-7	Figure 1-4 did not include oxidants. A revised figure is reproduced below.
IV-17	The caption for Figure 1-8 should read "Average annual rate of population change (1970-1975)."
IV-25	The page should be headed "3. ENVIRONMENTAL IMPACTS."
IV-26	Figure 3.1-1 did not include the entries for Airways Impeded, and is provided below in corrected form.
IV-37	Figure 3.2-1 did not indicate the Ldn levels and and is

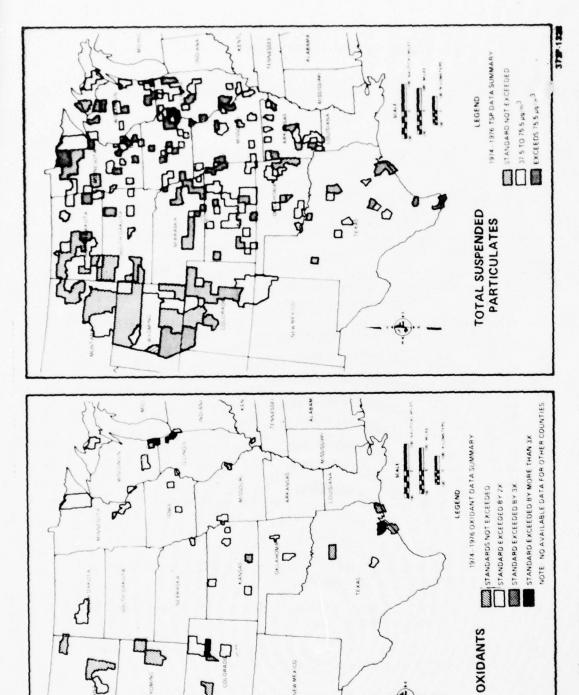


Figure 1-4. Areas having problems with one or more of the atmospheric pollutants.

AIRMOBILE BASING MODE COMPARISON SUMMARY OF ANTICIPATED ISSUES

		CONSTRUCTION				OPERATION					
ISSUE		ALERT Z				ALERT		ž			
REFERENCE	ANTICIPATED CONCERNS	мов	NEW	JOINT US		EXPEDIENT.	мов	NEW	JOINT USE		EXPEDIENT
NUMBER	A	MUB	BASE	CIV.	MIL.	Ä	MOB	BASE	CIV.	MIL.	EX
1.	INTERFERENCE WITH IMPORTANT SPECIES								***		
2.	AIR QUALITY										
3.	WATER QUALITY AND SUPPLY										
4.	LOSS OF RECREATIONAL ACCESS										
5.	NATURAL RESOURCES										
6.	LAND RIGHTS										
7.	ECONOMIC ISSUES										
8.	LOCAL GOVERNMENT ISSUES										
9.	PUBLIC SAFETY		***								
10.	AIRWAYS IMPEDED										
11.	ARCHAEOLOGICAL ISSUES										
12.	CEMENT										
13.	ENERGY				******						
14.	NOISE				***						

HIGH/MEDIUM POTENTIAL
LOW POTENTIAL
NONE-ANTICIPATED

372P-1198-3

Figure 3.1-1. Air mobile basing mode comparison summary of anticipated issues.

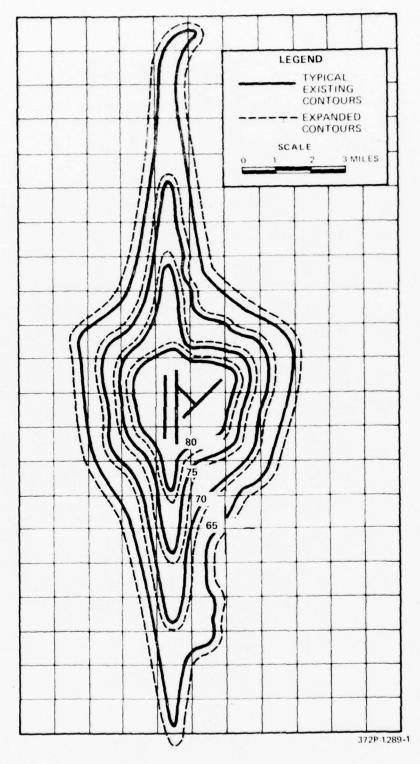


Figure 3.2-1. Typical MOB noise footprint ($L_{\mbox{dn}}$).

provided below.

IV-40

The data in Table 3.2-3 has been revised. The revised table is provided below.

Table 3.2-3. Aircraft emissions for local and training flights

AIRCRAFT	POLLUTANT (AMBIENT BASELINE	EMIS	EMISSIONS			
ENGINE TYPE	kg/yr)	lb/yr	kg/yr	INFLUENCE		
C-5 TF39-GE-1	1.95 x 10 ⁷	2.3×10^5	1.05 x 10 ⁵	0.53%		
	3.04 x 10 ⁶	9.9 x 10 ⁴	4.5 x 10 ⁴	1.46%		
	HC 1.88 x 10 ⁶	7.8 x 10 ⁴	3.5 x 10 ⁴	1.83%		
YC-15 JT8D-17	co 1.95 x 10 ⁷	2.1 x 10 ⁵	9.5 x 10 ⁴	0.48%		
	3.04 x 10 ⁶	1.1 x 10 ⁵	5.0 x 10 ^t	1.62%		
	HC 1.88 x 10 ⁶	5.9 x 10 ⁵	2.7 x 10 ⁴	1.42%		
YC-14 Cf6-50E	co 1.95 x 10 ⁷	4.3×10^5	2.0 x 10 ⁵	1.02%		
	3.04 x 10 ⁶	2.2 x 10 ⁵	1.0 x 10 ⁵	3.18%		
	HC 1.88 x 10 ⁶	1.8 x 10 ⁵	8.2 x 10 ⁴	4.18%		

IV-48

The first paragraph on this page indicates that "dispersal sites have not been included in the analysis as no significant construction or routine operation is planned for these sites at this time."

Subsequent studies have indicated that construction may be required at some dispersal sites. The following material pertains to the construction requirements for dispersal sites.

Primary dispersal sites would be located in the central United States. To the extent possible, they would be existing military/joint-use bases and use available power, fuel, and control tower services. The required runway

length would be 5,000 ft for the AMST.

Secondary dispersal sites would be distributed throughout the continental United States. Each site would provide a location for takeoff and landing. Currently existing runways of all types plus dry lake beds and highways are being considered to minimize construction costs. Operation at the secondary dispersal sites will be self-contained within the aircraft, minimizing the need for support services. The required runway length would be 2,500 ft for the AMST.

Surveys of available dispersal sites have been made and summary results are given in the table below.

Preliminary Estimates - Availability of AMST dispersal sites.

TYPE SITE	NUMBER AVAILABLE	NUMBER SUITABLE AS IS	NUMBER REQUIRING CONSTRUCTION	TOTAL LAND AREA REQUIRED sq. mi	ESTIMATED COST/SITE REQUIRING CONSTRUCTION 1977 DOLLARS
Primary Dispersal	104	11	93	1 to 3	\$1,500,000
Secondary Dispersal	2,403	1,454	949	7 to 10	\$ 300,000

The above estimates are for an AMST. WBJ costs would be roughly twice those given.

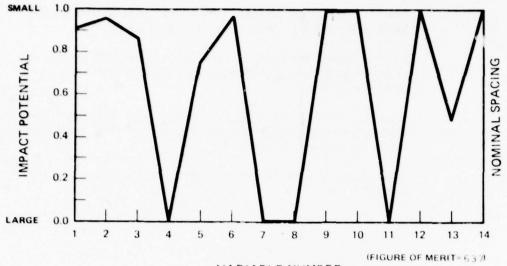
The Basing Mode Analysis in Section 3 of Volume IV was made prior to completion of the Dispersal Site Study and did not take the above construction requirements into account. Examination of the above estimates indicates that the land required for dispersal sites is less than the differences in requirements for the typical and low cost option given in Table 3.1-3 of Volume IV. These two options are not widely different in environmental impact. Further, these land and construction requirements are spread over 1,500 sites where the individual impact will be small. The original judgment that the effect of the dispersal sites on the analysis was small still holds and the analysis results remain valid.

On the beneficial side, many airfields will have their runways extended improving the airfield value for routine civilian use.

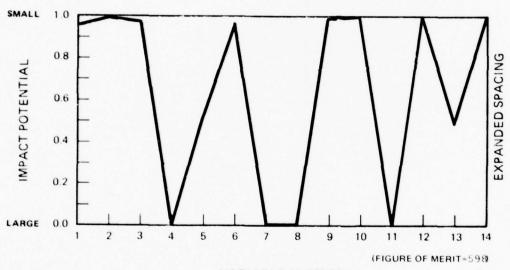
IV-50	Line 2 of the second paragraph should end "Figures 3.3-1 through 3.3-6."
IV-59	The column in Table 3.3-2 labeled "AMST TYPICAL" should read "WBJ TYPICAL."
IV-93	Section 3.4.4, second paragraph, last sentence, delete "within defensive limits."
IV-96	Figure caption should read "Air mobile parametric

	analysis: AMST and WBJ reduced project." The upper case should be labeled "AMST," the lower "WBJ."
IV-101	The top of page should carry the caption "VERTICAL SHELTER, POINT SECURITY, FULL FORCE."
IV-103	Figure 3.5-8 erroneously provided the impact profile for a one-third force deployment. The proper figure is provided below.
IV-109	Entries under "Important Species" and "Safety" were inadvertently omitted from Table 6-1. The corrected table is provided below.
IV-111	Section 9 should read "DETAILS OF UNRESOLVED ISSUES."

VERTICAL SHELTER, POINT SECURITY, FULL FORCE



VARIABLE NUMBER



VARIABLE NUMBER

372P-1320

- 1. INTERFERENCE WITH IMPORTANT SPECIES
- AIR QUALITY
 WATER QUALITY AND SUPPLY
 ACCESS LOSS (RECREATION)
- NATURAL RESOURCES
- LAND RIGHTS
- **ECONOMICS**

- LOCAL GOVERNMENT ISSUES PUBLIC SAFETY AIRWAYS IMPEDED 8.
- 10.
- ARCHAEOLOGY 11.
- CONSTRUCTION MATERIALS (CEMENT) 12.
- ELECTRICAL ENERGY 13.
- 14. NOISE

Figure 3.5-8. Impact Profile - MPS option Central Nevada.

Table 6-1. Summary of potential short-term and long-term impacts.

ANTIC IPATED CONCERNS	· SHORT-TERM	LONG-TERM
Important Species	Displacement to adjacent areas if new alert bases required Sensitization period for aircraft noise	Some habitats may be degraded
Air Quality		Localized increased emissions near MOBs
Water Quality and Supply	Potential for runoff from deicing (urea) but should be less than from agricul- ture	
Natural Resources		Loss of habitat and vege- tative cover Increased noise where new alert bases required
Land Rights		A small number of inhabitants may be displaced and small amounts of private land may be required
Economics	Some pressure on construc- tion wages and prices may be felt, particularly near MOBs located in a small community	Loss of some prime farm land Substantial local growth at MOBs near small economies
Local Government Issues		Severe impacts on public services may be felt in smaller areas Housing shortages in small communities
Archaeology	Careful siting of new bases could keep archaeo- logical disruption to a minimum	Some archaeological sites may be lost and data recovery progress will remove archaeological resources from their current context

372T-7069

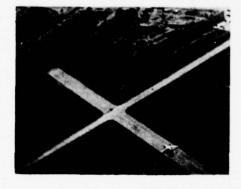
Table 6-1. (Cont.)

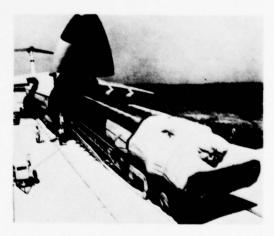
ANTICIPATED CONCERN	SHORT-TERM	LONG-TERM
Construction Materials	Short-term disequilibrium in demand and supply may occur	
Energy	Increased POL consumption	May require transmission or generating facilities in some areas
Noise	Increased noise levels from aircraft operations at all sites but poten- tially significant only at new alert base and intermittantly there	
Safety		Potential for public concern over safety issues

372T-7069

V Appendices







V. APPENDICES

The following text changes apply to Appendix A of the Draft Supplement.

PAGE COMMENT

A-2	Add the following information to the heading: mi^2 - 100,000, chi-factor 1.0 (Compare with A-17).
A-3	Add the following information to the heading: mi^2 - 100,000, chi-factor 1.0 (Compare with A-18).
A-4	Add the following information to the heading: mi^2 - 100,000, chi-factor 1.0 (Compare with A-19).
A-5	Add the following information to the heading: mi^2 - 100,000, chi-factor 1,0 (Compare with A-15 and A-20).
A-6	Add the following information to the heading: mi^2 - 100,000, chi-factor 1.0 (Compare with A-21 and A-22).
A-7	Add the following information to the heading: mi^2 - 510,000, chi-factor 0.8 (Compare with A-12).
A-8	Add the following information to the heading: mi^2 - 510,000, chi-factor 0.8 (Compare with A-15).
A-9	Add the following information to the heading: mi^2 - 510,000, chi-factor 0.8 (Compare with A-14).
A-10	Add the following information to the heading: mi^2 - 510,000, chi-factor 0.8 (Compare with A-15).
A-11	Add the following information to the heading: mi^2 - 510,000, chi-factor 0.8 (Compare with A-16 and A-22).
A-12	Add the following information to the heading: mi^2 - 510,000, chi-factor 1.2 (Compare with A-7).
A-13	Add the following information to the heading: mi^2 - 510,000, chi-factor 1.2 (Compare with A-8).
A-1,4	Add the following information to the heading: mi ² - 510,000, chi-factor 1.2 (Compare with A-9).
A-15	Add the following information to the heading: mi ² - 255,000, chi-factor 1.0 (Compare with A-5 and A-20).
A-16	Add the following information to the heading: mi ² - 510,000, chi-factor 1.2 (Compare with A-11 and A-22).

A-17 Add the following information to the heading: mi² -510,000, chi-factor 1.0 (Compare with A-2). A-18 Add the following information to the heading: mi² -920,000, chi-factor 1.0 (Compare with A-3). A-19 Add the following information to the heading: mi² -920,000, chi-factor 1.0 (Compare with A-4). A-20 Add the following information to the heading: mi² -920,000, chi-factor 1.0 (Compare with A-5 and A-15). A-21 Add the following information to the heading: mi² -920,000, chi-factor 1.0 (Compare with A-6 and A-22). A-22 Add the following information to the heading: mi² -510,000, chi-factor 1.0 (Compare with A-6, A-11, A-16, A-21).

APPENDIX F GLOSSARY AND ACRONYMS F-1 GLOSSARY

The following should be substituted in Appendix F.

9					
Air Mobile Defense System	One which uses air mobility to provide a basing mode for MX.				
Alert Base "austere base"	A base in a ready posture with the minimum necessary facilities and few or no permanently assigned personnel. Bases are sited to provide escape time from a surprise attack.				
C ³ Network	A command, control, and communications network.				
Dispersal sites	Unmanned airstrips which use any appropriate existing surface that is adaptable for landing under emergency conditions.				
Excursion	A variation in the project configuration or location.				
Main Operating Base	A base containing all the facilities necessary for the support of the alert base.				
"Naturalness" Value	The value of an untouched area in which plants and animals may be				

observed and studied. Because the area acts as a control situation, the data obtained can be used for making value judgments concerning the impacts of human intervention on the natural habitat of an area.

Paleo Indian

Refers to ancient American Indian culture.

Primary Dispersal Site

One of approximately 100 sites located in central CONUS (see Section 1.2)

Secondary Dispersal Site

One of several thousand sites located within the entire United States (see Section 1.2)

TRIAD

A defensive system which has three types of offensive components, each with its own strengths and weaknesses, so that no single enemy threat can destroy the system.

F-2 ACRONYMS

AFFTC

Air Force Flight Test Center Edwards AFB, CA.

AMST

Advanced Medium Short Takeoff and Landing Transport aircraft

CONUS

Continental United States.

DEIS

Draft Environmental Impact

Statement

GBS

Ground Beacon System

GPS

Global Positioning System

MED

Medium Engineering System

мов

Main Operating Base

MPS

Multiple Protective Structure system (a class of survivable ICBM deployment systems)

NMCS

National Military Command System

POL Petroleum, oil, lubricants

SLBM Submarine Launched Ballistic

Missile

SPO System Program Office

TSP Total suspended particulates

WBJ Wide-bodied jet aircraft

APPENDIX G - REFERENCES

The following should be substituted in Appendix G:

CHAPTER II

- California Employment Development, 1978. Contained in <u>California</u>

 <u>County Fact Book 1976-1977 and 1977-1978</u>. County Supervisors

 <u>Association of California</u>, 1977 and 1978.
- Central Puget Sound Economic Development District, 1978. "1975-1979 Overall Economic Development Program and Preliminary Comprehensive Economic Development Strategies for the Central Puget Sound Region, Seattle, WA."
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- Washington State Employment Security Department, November 1978. Labor Market Information Review - Washington State.
- U.S. Bureau of the Census, 1972. 1970 Census of Population: Characteristics of the Population, Number of Inhabitants, Table 10, Vols. 1-2.
- U.S. Bureau of the Census, 1973. County and City Data Book, 1972, Appendix C-2.
- U.S. Bureau of the Census, 1978. County and City Data Book, 1977, Table 2.

CHAPTER IV

- Ames, D. R., 1978. "Physiological Responses to Auditory Stimuli,"

 Effects of Noise on Wildlife, Fletcher and Busnel, eds., New

 York: Academic Press, pp. 23-46.
- Anisimov, V. D. and V. D. Il'ichev, 1975. "Characteristics of the

- Acoustic Environment of the Long-Eared Owl," Mosc. Univ. Biol. Bull. 30:112-115.
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- Lynch, T. E. and D. W. Speake, 1978. "Eastern Wild Turkey Behavioral Responses Induced by Sonic Boom," in Effects of Noise on Wildlife, J. L. Fletcher and R. G. Busnel, eds., New York: Academic Press, pp. 47-62.

- National Association of Counties, 1977. The County Yearbook, 1977, Washington, D.C., National Association of Counties and International City Management Association, pp. 7-40.
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- U.S. Air Force, (1975, rev. 1977). TAB A-1, Environmental Narrative, Ellsworth AFB, Rapid City, SD.
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- U.S. Bureau of the Census, 1973. County and City Data Book, 1972. Washington, D.C., U.S. Government Printing Office, Appendix C-2.
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VI Public Comments

VI. PUBLIC COMMENTS

6.1 RESPONDENTS TO THE AIR MOBILE DRAFT SUPPLEMENT

Copies of the Draft EIS supplement were provided for review and comment to federal, state and local government agencies, and the general public. Written comments were received from the following:

Federal Agencies

U.S., DOI, Bureau of Land Management, Silver Spring, MD U.S., Department of the Interior, Office of the Secretary

U.S., Environmental Protection Agency

U.S., Nuclear Regulatory Commission, Region III U.S., Nuclear Regulatory Commission, Region IV

State and Local Agencies

Arizona Council of Governments, District IV Colorado, Department of Local Affairs Cornhusker Regional Council of Governments Extra Metropolitan Council of Governments, Fremont, NE Georgia, Office of Planning and Budget Greater Southwest Regional Planning Commission, Garden City, KA Kansas, Office of the Governor Kansas, Department of Administration Mid-Elkhorn Valley Council of Government, Norfolk, NE Mississippi, Department of Archives and History Missouri, Office of Administration Nevada Office of Planning Coordination Nevada State Museum New Mexico, Department of Finance and Administration New Mexico, Office of the Governor Oklahoma Department of Health Texas General Land Office Texas, Office of the Governor Washington, Department of Ecology Wisconsin, Department of Natural Resources

National Organizations

Center for Law and Social Policy National Cattlemen's Association SANE, A Citizens Organization for a Sane World Sierra Club

Wyoming, State Planning Coordinator's Office

State and Local Organizations Nebraskans for Peace

Individuals

Mrs. Mary P. Austin, Pauma Valley, CA Mr. and Mrs. Henry Beine, Hatton, ND Mr. Tim Buchanan, Yuma, CO Ms. Marguerite Christoph, San Diego, CA Ms. Ardyth Denich, Kief, ND Tom Dudley and Mary Jo Weavers, Corvallis, OR Mr. E. E. Johnston, Denver, CO Ms. Mary Schaffert, Curtis, NE Ms. Nancy Schaffert, Curtis, NE Sister Jeanette Sulzman, Long Pine, NE

6.2 COMMENTS AND RESPONSES

Comments received on the Draft Supplement, and the Air Force responses follow.

FEDERAL AGENCIES



United States Department of the Interior

1793(930)

BUREAU OF LAND MANAGEMENT

FASTERN STATES OFFICE 7981 Eastern Avenue Silver Spring, Maryland 20910

MAR 9 1979

SAMSO/MNND Norton Air Force Base California 92409

To Whom It May Concern:

Thank you for giving us the opportunity to review your Air Mobile Draft Supplement to the FEIS on MX:Milestone II.

This office has jurisdiction (primarily Federal mineral ownership) in about half of the states (Minnesota, Iowa, Illinois, Wisconsin, Michigan, Indiana, Kentucky, Missouri, Arkansas, Louisiana, Tennessee, Mississippi) included in your air mobile study areas and we do not anticipate any conflicts between your proposal and our programs if mitigation discussed in the document is enforced. We do not, however, have the technical expertise available to provide detailed constructive comments on your alternative at this time.

We would be interested in reviewing future studies and statements that concern proposed deployment areas or bases within our area of jurisdiction.

Sincerely yours,

Pede Martin

Acting Director

Eastern States



United States Department of the Interior

OFFICE OF THE SECRETARY WASHINGTON, D.C. 20240

ER-78/707

MAR 1 4 1979

Dr. Carlos Stern
Deputy for Environment and Safety
Office of the Assistant Secretary
Department of the Air Force
Washington, D.C. 20330

Dear Dr. Stern:

We have reviewed the Air Mobile Draft Supplement to MX: Milestone II, sent to us on February 22, 1979. We appreciate the extremely tight timeframe you are operating under, but this did somewhat limit our review. If this option is selected for implementation, we ask for early consultation and coordination with this Department in the selection and environmental evaluation of the numerous sites that will be affected.

Our principal concerns include:

- early identification and close coordination with this Department in requesting the numerous tracts of public lands that will be required
- o inventory of each site for threatened and endangered species. This must include, where appropriate, consultation with and providing Biological Assessments to the Fish and Wildlife Service.
- inventory of each site for cultural resources and, where appropriate, consultation with the State Historic Preservation Officer

Specific comments and suggestions are enclosed for your consideration in preparing the final statement.

Larry E. Meierotto

Assistant SECRETARY

Enclosure

SPECIFIC COMMENTS

SPECIFIC COPPLENTS	
The environmental statement (ES) generally addresses those environmental elements which probably would be impacted by the proposed actions; however, several elements were not identified, but may be adversely affected by the actions. Those items of concern are: cumulative impacts on air/water quality, decommissioning procedures, visual impacts, and identification of need to obtain various permits/grants from affected Federal/State/local agencies.	2
The ES should include the identification of those agencies (Federal/State/local) which will require permits/grants for the construction of either on-/off-site facilities. Of particular interest would be the Bureau of Land Management's (BLM) requirement that a permit/grant must be obtained for rights-of-way if a facility is to be located on public land under its administrative control.	3
The ES should provide some additional discussion (types/locations) of off-site ancillary facilities; e.g., communication facilities, manned/nonmanned ground beacons, environmental monitoring devices, etc.	4
The ES should include Wilderness Areas in the discussion found on page IV-4, etc.	5
Page III-36. Airport related noise is likely to be detrimental to wildlife in general, in addition to the mentioned least tern colonies. We also believe that aircraft/bird strikes should be evaluated.	6
Page III-37. The double negative on the last 3 lines of this page is not comprehensible.	7
Page IV-8. Indicates that the Central Lowland Natural Region comprises most of the remaining area, and that studies are underway, but are not complete (relative to endangered species). How can judgments as to impacts be made when pertinent studies of the major area are incomplete? We find this incongruous and unacceptable.	8
Page IV-24-26. Raises questions about impact to endangered fauna and flora, but offers little resolution or specific mitigation to these problems. Also, the methodology for arriving at the endangered species decisions by the applicant is not stated or referenced.	9

Page IV-36 (3.2.3). Probable biological effects are well stated by the applicant.	
Page C-6,7,8 - Summary II, III C. The damages to wildlife have been grossly oversimplified. Further, the text implies minimal damage without providing supporting evidence explaining how these conclusions were reached.	11
Much of the summary material should appear in the main text.	
Also, three cited references in the text checked at random (Graham, 1969; Fletcher and Busnell, 1978; and Conner and Patterson, 1976) on Page C-11 do not appear in the reference section of the document.	12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

MAR 13 TA A

OFFICE OF THE

Carlos Stern, Ph.B.
Deputy for Environment, Safety and Health
Office of the Assistant Secretary
Department of the Air Force
Nashington, D. C. 20330

Dear Dr. Stern:

The U.S. Environmental Protection Agency (EPA) has reviewed your Air Mobile Braft Supplement to the Final Environmental Impact Statement entitled MX:Milestone II.

We recognize the air mobile concept as one additional alternative to four other possible ICSM system concepts already described and evaluated in the EIS which we reviewed and commented on last year. We believe that the supplemental draft EIS adequately identifies and addresses the important environmental issues related to development and testing of a prototype air mobile system. We have no objections to this proposed action. In fact, it seems environmentally preferable to the alternatives you discussed earlier. We have learned that the Air Force has also been investigating deploying those missiles on small submarines, and we believe that this alternative should also be analyzed in a supplement to the MX:Milestone II Final EIS.

We also believe that the Draft Supplement identifies the key factors essential for predicting the environmental effects likely to result from a decision that the air mobile system should enter the Full Scale Engineering Development (FSED) phase of the MX program. In that case, of course, the program would gain specificity with regard to numbers of aircraft, missiles, and deployment locations required. We look forward to reviewing the additional EIS's expected to be generated as the MX program moves ahead and more particular areas for environmental impact are identified.

13

We rate the present Graft EIS Supplement to be 10-1, lack of objections to the proposed action and adequate information in the EIS. If you have any questions concerning EPA's comments, please contact Mr. Pope Lawrence of this office at 245-3006.

Sincerely yours

William N. Hedeman

Director

Office of Federal Activities



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III

799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

February 9, 1979

SAMSO/MNND
ATTN: Carlos Stern, Ph.D.

Deputy for Environment

and Safety Norton AFB, CA 92409

Gentlemen:

We have received your letter of February 2, 1979, concerning the review of a Final Environmental Impact Statement for the Missile X or MX. This office does not wish to review this Final Environmental Impact Statement.

Sincerely,

Dinella Lone James G. Keppler

Director



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 611 RYAN PLAZA DRIVE, SUITE 1000 ARLINGTON, TEXAS 76011

February 15, 1979

Carlos Stern, Ph. D.
Deputy for Environment and Safety
Department of the Air Force
SAMSO/MNND
Norton Air Force Base, CA 92409

Dear Dr. Stern:

Concerning your memo to us, dated February 2, 1979, the nature of our official duties and functions are such that we should not be included in the distribution of the subject Draft Supplement EIS.

Sincerely,

W. E. Vetter

Assistant to the Director

cc: Karl V. Seyfrit, Director

RESPONSE TO COMMENTS FROM FEDERAL AGENCIES

- 1. The Air Force fully intends to coordinate and cooperate with the Department of Interior during the environmental evaluation for sites that might be affected.
- 2. & 3. The Draft Supplement did identify impacts on air/ water quality and visual impacts to the level required for FSED decisionmaking. Since specific candidate sites have not been identified, these impacts, which are generally site-specific, cannot be detailed at this time. In general, however, sites would be dispersed widely enough that most impacts would not be synergistic (i.e., cumulative). When it comes time to decommission the system, the Air Force will review whether it still needs the facilities. If it does not, the facilities will be handled in accordance with federal disposal law. Permits and grants will be obtained as needed. Identification of these requirements is part of the site planning process. The Air Mobile Supplement provided information on types and locations of ancillary facilities to the level of detail necessary for an informed decision at FSED.
- 4. If an air mobile alternative is selected for FSED, these facilities will be discussed in more detail in support of the deployment area selection EIS.
- 5. All designated wilderness areas will be excluded from consideration during the site selection process.
- 6. The Air Force has a bird-aircraft strike prevention program that frequently evaluates airfields for potential problems. At present, a bird-aircraft strike hazard does not exist at Vandenberg AFB. With respect to noise, see p III-35 of the Draft Supplement.
 - 7. Noted. See Errata.
- 8. The statement refers to natural landmark theme studies and not endangered species. These studies were used as a data base in preparing Figure 1-6 and the statement's significance is that designated or potential landmarks in the Central Lowlands Province are underrepresented in that province.
- 9. Methodology for arriving at endangered species impact potentials is described in the MX: Milestone II FEIS to which the Air Mobile document is a supplement. As with the Milestone II studies, the Air Mobile analyses are generic studies because specific sites and project configurations will not be determined prior to FSED. At that time, site-specific environmental analyses would be conducted at proposed sites. Facilities could be sited to avoid or minimize the potential impact on endangered species.
 - 10. Noted.
- 11. We have concluded that biological damage would be minimal since much of the construction and facility modification would take place at existing Air Force installations (Main Operating Bases) and airfields (Alert

Bases). If a few new alert bases are required, these small bases (about 2 mi²) could be sited to avoid sensitive biological areas and habitats that may support endangered species. Specific damage to particular wildlife will be evaluated in future site selection studies. The "summary material" referred to in your comment consists of summarized results of background studies used to assist in identifying potential biological issues.

- 12. See Chapter V of this document.
- 13. The investigations to deploy missiles on small submarines are being performed outside of the Air Force. This concept has not reached the stage of development sufficient for detailed environmental analysis.

STATE AND LOCAL AGENCIES

. 7	50-0054						OME	Approval N	o. 29-R0218	
		AL ASSISTANC	CE	2. Applicant's application	a. Number	3. State application identifier	a. Number AZ 79	-80-0		
	1. Type Of Preapplication Action Application (Mark appropriate Notification Of Intent (Opt.) Leave				b. Date 19 Year Month Day	b. Date Year month day Assigned 1979 02 23				
	The port of Federal Action					5 Federal F	5. Federal Employer Identification No.			
	4. Legal Applic		Air For	ro Baco		J. rederal C	imployer iden	tirication ivo		
	a. Applicant Name b. Organization Unit c. Street/P.O. Box d. City f. State c. State c. State c. Street (P.O. Box d. City c. State c. California c. Street (P.O. Box d. City c. Base e. County c. California g. Zip Code: 92409 c. Capt. Langdon Kellogg					6. Program (From Federal Catalog)	a. Number b. Title	b. Title Unknown		
Data	(Name & tele		14) 382-			Department of Defense				
1 - Applicant / Recipient	MENT TO FINAL ENVIRONMENTAL IMPACT STATEMENT - MX: MILESTONE II - ENVIRONMENTAL IMPACT ANALYSIS PROCESS This supplement provides additional environmental data & analysis of the air mobile option. The alternative addressed is use of mobility to provide a survivable basing mode for MX. This alternative as now envisioned consists of a transport aircraft capable of air launching a missile similar to those des- cribed in the Final Environmental Impact Statement.				A-State G-Special Purpose District B-Interstate H-Communic Action Agency C-Substate District H-Higher Educational D-County E-City J-Interstate (Specify): Federal Agency Enter appropriate letter K 9. Type of assistance					
Section	ities are	under consid	eration			C-Loan	Enter a	ppropriate lei	uer(s)	
Sec	10. Area of project impact [Names of cities, counties, states, etc. Statewide, Arizona (Also Nationwide)				11. Estimated number of persons benefiting	12. Type of application A-New C-Revision E-Augmentation B-Renewal D-Continuation Enter appropriate letter				
	13. Proposed Fu	nding	ssional District	s Of:	15. Type of change For 12c or 12e					
	a. Federal S		a. Applicant		b. Project 01 02 03 04	A-Increase Dollars F-Other Specify:):	
	b. Authorit	.00 .00 16. Project Start			17. Project	CIncrease Duration D-Decrease Duration				
	c. State	.00	Date Y	ear month day	Duration Months E-Cancellation			Enter appro- priate letter(s)		
	e. Other		19 18. Estimat		Year month date					
	f. Total S	1 .00		bmitted al agency 19						
	20. Federal agency to receive request (Name, city, state, zip code)					21. Remarks added				
		a the kest of my kee	wlodge and					Yes X	PER SANGERS AND PARTY.	
1 - Certification	22. a. To the cest of my knowledge and belief, data in this preapplication/application are true and correct, the Applicant Certifies That That Certifies That State Object of the applicant will comply with the attached assurances if the assistance is approved. (2) (3)				appropriate c	n was submitt learinghouses	ed, No and respon	Response attached		
Section	23 a. T Certifying represen- tative	yped name and title			b. Signature			c. Date signed Year month day 19		
_	24. Agency name					25.	Year	month day		
					Application received 19					
uo	26. Organizational Unit				27. Administrative office			28. Federal application identification		
cy Action	29. Address				30. Federal grant identification					
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	amendment d. Local e. Other		.00				date 19 37. Remarks added			
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Section III	e. Withdrawn	f. Total	s	.00				☐Yes ☐]No	
Sc	a. In taking above action, any comments reconsidered. If agency respons of Part 1, OMB Circular A-95, it has been on the comments of the			ceived from clearing- se is due under provisions r is being made.	b. Federal A (Name an	Agency A-95 Official ad telephone number)				
-	424-101						Standar	d Form 424 I	Page 1 (10,75)	

E SALED BESSELL ST. SELECTION OF SELECTION O

TO:

Mr. Frank Servin, Exec. Dir. District IV Council of Gov'ts 377 South Main St., Room 202 Yuma, Arizona 85364

From: Arizona State Clearinghouse

Phoenix, Arizona 85007

State Application Identider (SAI)

79-80-0014

FEB 23, 1979

:io. AZ State

Health

Ag. & Hort.

Center for Public Affairs

Bu. of Geology & Mineral Tech.

Game & Fish

OEPAD: S. Hancock

6 Region

This project is referred to you for review and comment. Please evaluate as to:

1700 West Washington Street, Room 505

- (1) the program's effect upon the plans and programs or your agency
- (2) the importance of its contribution to State and/or areawide goals and objectives
- (3) its accord with any applicable law, order or regulation with which you are familiar
- (4) additional considerations

Please return THIS FORM AND ONE XEROX COPY to the clearinghouse no later than 17 working days from the date in Please contact the clearinghouse if you need further information or additional time for review.

- 1 No comment on this project
- O Proposal is supported as written
- Comments as indicated below

Comments: (Use additional sheets if necessary)

Reviewer's Signature 12 a lexale Poule

Date 7 . 2 . -> 9

70 7. 2. /5%



Department of Local Affairs Colorado Division of Planning

Philip H. Schmuck, Director

Richard D. Lamm, Governor

March 12, 1979

Dr. Carlos Stern Deputy for Environment and Safety Office of the Assistant Secretary of the Air Force Pentagon Washington, D.C. 20330

SUBJECT: Mx: Milestone II

Air Mobile Draft Supplement

Dear Dr. Stern:

The Colorado Clearinghouse has received the above-referenced Draft Supplement and has circulated it for review by State agencies. Comments from the Colorado Department of Agriculture are enclosed for your reference. We request that these comments be given thorough consideration, and we hope that you will particularly note that the Department of Agriculture expressed some of the same concerns in comments on the draft versions of earlier volumes of the Mx Missile project.

Thank you for giving us the opportunity to review this matter.

Sincerely,

Chief Planner

SE/MK/vt Enclosure

cc: Office of the Governor Department of Agriculture Denver Regional Council of Governments Richard D. Lamm Governor

Morgan Smith

Donald L. Svedman
Deputy Commissioner



COLORADO DEPARTMENT OF AGRICULTURE

406 STATE SERVICES BUILDING 1525 SHERMAN STREET DENVER, COLORADO 80203

March 8, 1979

AGRICULTURAL COMMISSION

Clarence Stone, Center

William A. Stephens, Gypsum Vice-Chairman

Ben Eastman, Hotchkiss
John L Malloy, Denver
M. C. McComick, Holly
Etton Miller, Fort Lupton
Kay D. Morison, Fleming
William H, Webster, Greeley
Kenneth G, Wilmore, Denver

MEMORANDUM

TO:

Harris Sherman, Director

Department of Natural Resources

FROM

Morgan Smith, Commissioner/of Agriculture

SUBJECT: MX: Milestone II--Air Mobile Draft Supplement

Our major concern with this volume—and preceding volumes in the MX series—is the lack of explicit recognition of agricultural land productivity as an important siting criterion.

First, the initial locational requirements for the alert bases of the air mobile unit, listed on Page I-II, do not mention agricultural land. Recognizing that siting criteria will be refined later, we urge that agricultural land productivity be explicitly included as a criterion when this refinement is done.

Secondly, this draft document intimates that it has already been determined that the missile system will likely be located in an agricultural area: "The potential Air Mobile deployment area is generally agricultural and most land requirements will involve agricultural lands." (Page IV-41.) Such a statement is puzzling since refined siting criteria have yet to be developed, according to Page I-11.

Finally, we repeat our comment on the draft version of earlier volumes of this project: Namely, it is established federal policy that impacts on agricultural lands resulting from proposed federal actions be determined. The intent of this policy is to avoid using highly productive agricultural lands for non-agricultural purposes whenever possible. Since less than 25% of our nation's land base is capable of producing crops, and since agricultural exports from this land base are the key to a favorable trade balance for the nation, it is imperative that subsequent studies of the MX missile system explicitly recognize agricultural land productivity as a key criterion in project siting.

MS :mb

cc: State Clearinghouse

Cornhusker

regional council of governments

Rachel Dobscha - Director for Grant, Arthur, Keith, Perkins and Chase Counties

112 WEST FIRST

TOWN SQUARE PLAZA - SUITE 20

OGALLALA, NEBRASKA - 69153

Phone 308-284-6077

March 8, 1979

Mr. Carlos Stern, Ph.D. SAMSO/MNND Norton AFB Norton, California 92408

Re: SAI #790223 - MX Missle Air Mobile Draft EIS

Dear Dr. Stern:

The Region 19 Council of Governments wishes to reiterate its comments addressed to you in a letter dated September 4, 1978, regarding the draft environmental impact statement. The Region 19 COG gives the MX Missle Air Mobile Draft Environmental Impact Statement a negative review.

For the Council, General

Jess Bernard, Chairman

Region 19 Council of Governments

JB/cks

cc: S.O.P.P.

Extra Metropolitan Council of Governments

P.O. BOX C · FREMONT, NEBRASKA 68025 · (402) 721-4080



March 12, 1979

Carlos Stern, Ph.D.
Deputy for Environment and Safety
Office of the Assistant Secretary
Department of the Air Force
Washington, D.C. 20330

Dear Mr. Stern:

Your project MX Missle Air Mobil Draft EIS

has undergone local clearinghouse review pursuant to OMB Circular A-95.

Comments received are attached hereto and have been submitted to the state clearinghouse as well as to the funding agency.

No comments were received from any local governments or agencies as a result of this review.

This completes the local clearinghouse review. The state clearinghouse will notify you by separate letter when its review has been completed.

Very sincerely yours,

John P. Krueger, Director

cc: Neoma Parks, Project Review Coordinator State Office of Planning and Programming



Office of Planning and Budget Executive Department

Clark T. Stevens Director

GEORGIA STATE CLEARINGHOUSE MEMORANDUM

TO:

Carlos Stern, Ph.D. SAMSO/MNND Norton AFB, CA 92409

FROM:

harles H. Badger, Administrator Georgia State Clearinghouse Office of Planning and Budget

DATE:

March 12, 1979

SUBJECT: RESULTS OF STATE-LEVEL REVIEW

Applicant: Air Force, U.S.

Project:

Environmental Impact Analysis Process - Air

State Clearinghouse Control Number: 79-02-20-14

The State-level review of the above-referenced document has been completed. As a result of the environmental review process, the activity this document was prepared for has been found to be consistent with those State social, economic, physical goals, policies, plans, and programs with which the State is concerned.

Additional Comments: None

The following State agencies have been offered the opportunity to review and comment on this project:

The Department of Natural Resources The Department of Transportation

The Office of Planning and Budget, Executive Department

cc: Barbara Hogan, DNR

Enclosures: Comments prepared by the Department of Natural Resources, dated Feb. 23, 1979. Comments prepared by the Department of Transportation, dated March 7, 1979.

SC-EIS-4 (4/78)

270 Mashington St., S. III. - Atlanta, Georgia 3033-1

TO:

Florence Breen

FROM:

Office of Planning and Budget

Management Review State Clearinghouse

270 Washington Street, S.W. Atlanta, Georgia 30334

DATE:

February 20, 1979

SUBJECT:

REQUEST FOR REVIEW OF ATTACHED PROJECT NOTIFICATION

U.S. Department of the Air Force

Project:

Environmental Impact Analysis Process - Air Mobile

State Application Identifier: 79-02-20-14

Office of Planning and Budget Contact: Chuck Badger/Sam Williams

Your Comments Are Due By: March 5, 1979

A copy of the Notification of Intent to Apply for Federal Assistance for the above project is enclosed for your review and comment. Your review should focus on the proposal's compatability with those State goals, policies, objectives, plans, and fiscal resources with which your agency is concerned. Duplication of this proposed project with other projects should be pointed out. Specific recommendations for strengthening this proposal should be made if you feel that there are weaknesses in it.

Any major points of conflict identified by you during your review should be immediately brought to the Clearinghouse's attention. The Clearinghouse's telephone numbers are (404) 656-3855 and (404) 656-3871. The Clearinghouse will make arrangements for a conference with the Applicant if there is cause for such a conference.

Please have your comments typed on the enclosed Form SC-3. An additional sheet may be used if additional space is needed. Your comments will be attached to the formal application when it is submitted to the appropriate Federal agency. Thank you for your cooperation.



Joe D. Camer COMMISSIONER

Bepartment of Natural Resources

270 WASHINGTON ST. S.W ATLANTA. GEORGIA 30334 (404) 656-3500

February 23, 1979

MEMORANDUM

TO:

Chuck Badger, Administrator

State Clearinghouse

FROM:

Barbara A. Hogan, Coordinator BAR

Comprehensive Review

ISSUE:

Completion of Department of Natural Resources Review of

State Clearinghouse Control Number 79-02-20-14

APPLICANT:

U.S. Air Force

PROJECT:

Environmental Impact - Analysis Process - Air

Mobile

FEDERAL AGENCY:

USAF

CO: MENTS

The Department cannot make pertinent comments on this EIS for several reasons which are outlined below.

- (1) If this approach to MX Missile deployment is selected, bases for this system are subject to site-specific EIS documentation;
- (2) The engineering development phase of this project may affect the Atlanta region (Section II of the document); however, selection of Atlanta among several regions with engineering infrastructures is a future decision not directly connected with the natural resources of this region;
- (3) The missile-flight testing phase discussed in this document does not affect Georgia; and
- (4) Georgia is also not included in the study area for the air mobile basing phase.

While DNR cannot provide constructive comments on this supplement document, we would like the opportunity to review additional forthcoming studies which could impact this State.

BAH: sab

TO: State Clearinghouse

Office of Planning and Budget 270 Washington Street, S.W. Atlanta, Georgia 30334

FROM:

Name:

Mr. Florence L. Breen, Director of Planning and Programming

Agency: Department of Transportation

SUBJECT: RESULTS OF REVIEW OF ATTACHED PUBLIC NOTICE

State Application Identifier:

79-02-20-14

DATE:

March 7, 1979

This notice is considered to be consistent with those State (goals), (policies), (objectives), (plans), (programs), and (fiscal resources) with which this organization is concerned. (Line through inappropriate word or words).

This notice is recommended for further development with the following recommendations for strengthening the project (additional pages may be used for outlining the recommendations).

This notice is not recommended for further development (accompanied by detail comments which explains the Division's rationale for this decision).

I have reviewed the EIS and find that actual construction would not take place in Georgia. However, it is likely that additional aero space employment in the Atlanta Region might be a side effect. The Atlanta Regional Development Plan does accommodate this type of change so we would have no unanticipated pressures on the transportation plan.

Greater Southwest

REGIONAL

PLANNING

COMMISSION



CHAIRMAN
Ed Lewis
VICE CHAIRMAN, STATE
FEDERAL AND REGIONAL
Dr. Richard Brownrigg
VICE CHAIRMAN, LOCAL
Sallyann McCue
SECRETARY TREASURER
Robert Arheart
EXECUTIVE DIRECTOR
Gerald Cooper

Phone 316-275-9176

P.O. Box 893

i118 North Taylor

Garden City, Kansas 67846

RESEARCH AND DEVELOPMENT

March 12, 1979

Carlos Stern, Ph.D.
Deputy for
Environment and Safety
Department of the Air Force
Washington, D.C. 20330

Dear Mr. Stern:

Pursuant to and in accordance with guidelines established in Office of Management and Budget Circular A-95 and by the authority vested with the Greater Southwest Regional Flanning Commission by the Governor's Office, we have reviewed the proposed application for Air Mobile Draft Supplement to Final Environmental Impact Statement (MX: Milestonand found it to be consistent with and contributing to regional plans and priorities. Coordination in the regional interest of the activities and development of the region is essential to the present and future well-being of Couthwest Kansas. That is the primary objective of the Commission in the conduct of its review function. Such decisions are made in every case by the appropriate federal and state agency and the Commission's role is limited to the submittal of comments which are advisory only.

The funding of this proposed project is considered to be of high priority. The Commission endorses the proposed project and solicit its timely effectuation. A copy of this clearinghouse letter should be included with the submitted application. If we can be of further assistance in this or other matters, please advise.

Respectfully,

Ed Lewis, Chairman

8 0

Roy Loutzenheiser, Acting Executive

Director

FL:RL:rd

cc: Ed Flentje, Division of State Flanning and Research

55

62 LOCAL GOVERNMENTS COOPERATING FOR A GREATER SOUTHWEST KANSAS

CLARK COUNTY • FINNEY COUNTY • FORD COUNTY • GRANT COUNTY • GRAY COUNTY • GREELEY COUNTY

HAMILTON COUNTY • HASKELL COUNTY • HODGEMAN COUNTY • KEARNY COUNTY • LANE COUNTY

MEADE COUNTY • MORTON COUNTY • NESS COUNTY • SCOTT COUNTY

SEWARD COUNTY • STANTON COUNTY • STEVENS COUNTY • WICHITA COUNTY

STATE OF KANSAS



OFFICE OF THE GOVERNOR State Capitol Topeka 66612

John Carlin Governor

March 8, 1979

Dr. Carlos Stern, Deputy Environment and Safety Office of the Secretary of the Air Force Room 4C885 - The Pentagon Washington, D. C. 20330

Dear Dr. Stern:

Under separate cover you will be receiving the A-95 comments and concerns of a number of my agencies regarding the air mobile option of the MX Missile. I would like to take this opportunity to reiterate our past and present concerns and request that you keep my staff informed of major developments relating to the siting of the MX Missile. I would also like to express my appreciation for the efforts of the Department of the Air Force and your office in assisting my staff in their review of both the Final Environmental Impact Statement and the Draft Supplement.

It is my desire, however, that as the decision on deployment moves through full scale engineering development, that my staff be kept informed of siting activities in the State of Kansas very early in the process and that we be allowed to participate in the final decision on deployment should any sites in Kansas still be under consideration at that time.

Thank you for your assistance and cooperation in this matter. Should you have any questions or information, please contact Mr. John Mendoza, Director of the Division of State Planning and Research (913-296-3496) or contact my office directly. I am looking forward to working with you on this matter in the future.

With every best wish, I remain

JC:cms

Sincerely,

JOHN CARLIN

56

STATE OF KANSAS



DIVISION OF STATE PLANNING AND RESEARCH

5th Floor—Mills Building 109 W. 9th Topeka, Kansas 66612

March 6, 1979

SAMSO/MNND Norton Air Force Base California 92409

Re: Air Mobile Draft Supplement to the FEIS, MX: Milestone II Project SAI#: 6832.

The Air Mobile Draft Supplement to the FEIS, MX: Milestone II Project has been processed by the Division of State Planning and Research under its clearinghouse responsibilities as described in OMB Circular A-95.

We realize that this project does not address deployment. However, Kansas is included in both the primary and secondary study areas and our review agencies have addressed the project as to its potential effect on Kansas if the Air Mobile Concept is adopted.

I am attaching copies of comment sheets returned to our office from various state review agencies. It is the contention of this Clearinghouse that the Air Mobile Concept could adversely affect the people of Kansas and its resources.

Sincerely,

Tal VD Cart

Paul V. DeGaeta A-95 Coordinator

PVD:jc

Attachment

cc: Carlos Stern, Ph.D., Deputy for Environment & Safety, Washington, D.C.

 $\frac{\text{NOTE}}{\text{Para. V}}$. All future requests for A-95 Review should take the intent of Part I, $\frac{1}{2}$ Para. V, of OMB Cir. A-95 into consideration when determining the amount of time alloted for review of such major projects.

15

A-95 Review of the Air Mobile Option of the MX Missile (SAI #6832)

Background

The United StatesAir Force has previously prepared and issued Draft (10 July 1978) and Final (30 September 1978) Environmental Impact Statements addressing the environmental consequences of Full-Scale Engineering Development (FSED) and the Basing Mode Decision for a new Intercontinental Ballistic Missile (ICBM) known as MX. The MX system is to be more survivable than present ICBM systems. The Air Force contends that achievement of this survivability will require both a new, more capable missile and deployment in a different way than is used for the existing missile force. Currently, missiles are emplaced in buried concrete structures (silos), with one missile in each. These missiles are becoming increasingly vulnerable with increases in the numbers and accuracy of the weapons that can be used against them.

The MX: Milestone II Environmental Impact Statement (EIS) addressed the potential environmental consequences of development and procurement of a number of full-scale prototype missiles and missile carriers and of a series of tests associated with these prototypes. This action is known as Full-Scale Engineering Development (FSED) and the decision to proceed with this development phase is known as the Milestone II decision. The FSED decision does not include selection of deployment areas or bases for the operational missile, nor does it provide for production of final operational equipment. Those decisions, if made, require appropriate additional environmental studies and statements.

The MX: Milestone II EIS also addressed the comparative environmental effects of four survivable basing modes for the missile systems and of variants on those modes. These were known as buried trenches, vertical shelters, horizontal shelters and pools; all provided for ground transportation of the missiles among protective structures. At any time, a given missile would be in only one of a number of possible structures, so that all of them would have to be targeted to be certain of destroying the missile.

The Basing Mode Evaluation Volume (Volume IV) of the Final EIS very briefly included as possible alternative concepts two air mobile options which under previous studies had been found to be less suitable than the four candidate basing modes for MX mentioned above.

In December, the Defense System Acquisition Review Council (DESARC), decided that additional consideration should be given to air mobile options at the Milestone II decision point for MX. This Supplement, SAI #6832, provides additional environmental data and analysis of the air mobile option. The Final Supplement, in conjunction with the MX: Milestone II FEIS, will provide the environmental information necessary for consideration of this broader choice among all the basing options. It is currently anticipated that this decision could be made as early as April, 1979.

Summary of Air Mobile Alternative

The alternative addressed in this Supplement is use of air mobility to provide a survivable basing mode for MX. This option and the Multiple Protective Structure (MPS) options formerly known as Multiple Aimpoint (MAP)

will be considered at Milestone II as potential candidates for Full-Scale Engineering Development (FSED).

The Air Mobile ICBM concept as presently conceived consists of the following elements:

- --Aircraft capable of transporting and airlaunching ICBM
- --Missiles similar to those described in the MX: Milestone II FEIS
- --A structure of air bases and landing sites to support the system and provide for survivable operation during wartime operations
- --Ground beacons to provide position and velocity information to the aircraft and the missile guidance system
- --Command, control and communications (C3) systems required for positive, reliable and responsive operation

Survivability against an anticipated attack or extended survival after an attack is provided through random movement of the aircraft among a large number of dispersal sites. An aircraft landing at such a site moves to another site before it can be detected and attacked.

Aircraft carrying fully operational missiles would fly only when an actual attack had occurred, or was judged to be imminent. This is the present practice with the strategic bomber force.

Three classes of operational locations are visualized under this concept, only two of which are involved directly in routine peacetime operations:

- --Main operating bases (MOBs) for support of a number of assigned personnel and their associated equipment and personnel
- --Alert bases, at which two or more aircraft with missiles are stationed. Crews and minimum support personnel would be rotated from the main operating bases.
- --Dispersal sites, where alert base aircraft could land and among which they could move in the extremely unlikely event of an actual or imminent missile attack on the United States. The Air Force intends to use existing military bases and civilian airfields and other available expedient landing sites for this purpose.

Main Operation Bases (MOB)

Main operating bases would be existing Air Force bases, located to support aircraft at their associated alert bases. From 5 to 8 MOBs will likely be required, depending on the type of aircraft selected and the final scale of deployment. MOBs need not be located within the "survival area" required for alert bases, but must be close enough to these bases for efficient operation. The MOBs are expected to provide facilities for support of both missiles and aircraft.

Main Operating Bases will provide aircraft, missile and personnel support. Some may provide aircraft support functions only. All MOBs will require facilities for command and administration and for personnel support (including the personnel on rotational duty to alert bases).

The additional area required for these facilities depends on functional requirements for the MOB and the specific existing base selected. For planning purposes, a nominal 1,900 acres (750 ha) has been used. Final designs will be unique to each base because the extent of construction required will depend on the type and number of aircraft and missiles and the availability, adaptability and condition of the existing base facilities.

Alert Bases

The alert bases provide limited support of two or more aircraft in a ready posture. The actual number of bases will be established during FSED. Alert personnel would rotate from associated MOBs every seven days, and most support for the alert base would come from the MOBs.

Alert bases would be located to provide for survival, public safety and minimum impact on cultural resources. Criteria currently considered applicable are listed below:

- --Approximately 700 nm (1,000 km) from coastal waters
- --Excluded areas: National parks, monuments; Indian reservations; existing ICBM installations; areas over 5,000 ft. (1,500 m) altitude
- --60 nm (110 km) minimum distance between bases
- --18 nm (35 km) from cities over 25,000 population
- -- 3 nm (5.5 km) from cities 5,000-25,000 population
- --Distances from inhabitated buildings, traveled public highways and passenger railroads as required by explosives safety criteria

Depending on economic considerations, threat analyses and availability of suitable existing airfields, the primary study area may be enlarged as indicated by Figure 1.

An alert base is expected to require approximately two mi2 (5 km2) of land, varying with the type and number of aircraft accommodated and the final design features. Clear areas (no inhabited buildings) required by explosives safety regulations may extend a limited distance beyond base boundaries. A cleared zone of at least 30 ft. (9m) would be required around all fences and the surrounding area must be in clear view for detection of intruders. A road would be required to the nearest public highway and electrical power for normal operations would be provided from commercial sources. A handling facility will be required, as the reentry vehicles are not to be flown attached to the missile in peacetime.

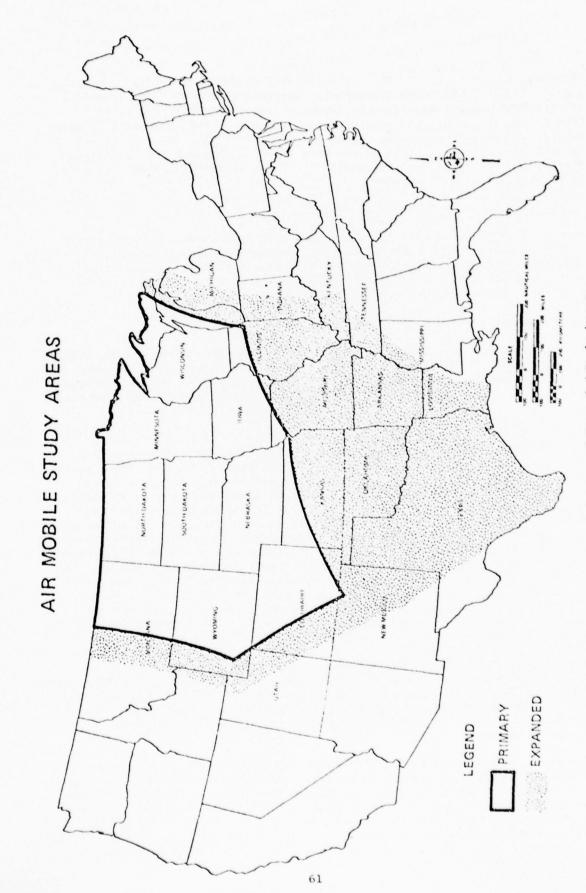


Figure 1. Primary and Expanded Study Areas.

The total number of alert bases is to be determined during Full-Scale Engineering Development. The type of aircraft, the type of missile, the number of reentry vehicles per missile, the number of missiles per aircraft, the cost of the system and the projected threat are all items that will be major considerations in determining the number of alert bases. Current estimates involve 30 to 70 alert bases in the area shown in Figure 1. As noted previously, to the maximum extent practical, these will be existing airfields, preferably military airfields.

Dispersal Sites

Several thousand dispersal sites throughout the continental United States would be required to establish location uncertainty and enhance survivalibility. Dispersal sites will include existing airstrips and other types of paved or unpaved surfaces, such as dry lake beds or highways. The exact number and types of dispersal sites will be established in FSED.

Comparison with the Multiple Protective Shelter (MPS) Option

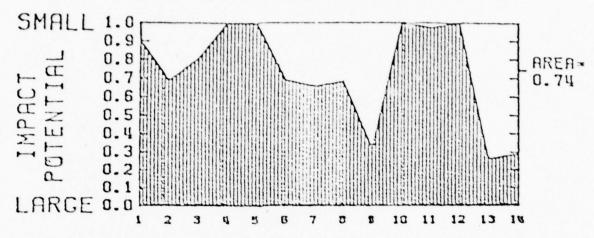
This section compares air mobile with the MPS as presented in the MX: Milestone II FEIS. A brief overview of the MPS system is presented followed by impact profiles for various excursions. Comparable air mobile configurations are then presented and the resulting potential impacts are discussed.

Brief Overview of the MPS Basing Modes

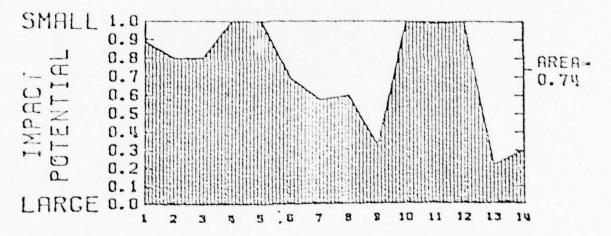
The MPS system is a series of protective structures among which missiles are covertly transported. Security of the MPS system would be either point or area. Point security could have fencing and restricted access around the protective structures. Connecting roadways and adjoining areas would be open to the majority of current land uses including agricultural uses and recreation. Area security would place restrictions upon the adjacent area as well as around the protective structure. The entire system would be served from one or two main bases located to minimize new construction and operation costs. Further environmental and engineering evaluation will be performed prior to selection of a site or sites for deployment. Volume IV of the FEIS discussed typical areas throughout the Western United States where potential basing could occur. In general, the areas used for basing mode comparison were divided between those publicly and those privately owned. The impacts upon biological and archaeological resources were greatest in undisturbed areas of the west, particularly existing military reservations. The social and economic impacts were found to be greatest in areas of private land holdings, with the degree of impact directly proportional to the number of land owners affected and the intensity of farming and related activities. In addition, the specific locations chosen for the MPS main base or bases would likely have localized significant social and economic impacts.

The analysis performed on the MPS system in the Milestone II FEIS has been displayed in the same fashion as used for the air mobile discussion. Figure 2 shows the impact profiles for the nominal AMST and the WBJ configurations. Figure 3 shows the impact profile for the MPS, vertical shelter, point security, with nominal and expanded spacing options in the South Platte Plains Region of the physical-biological regions discussed in the FEIS. Essentially these figures indicate the relative potential impact upon the environment for each of the 14 variables shown.

Modified Advanced Medium Short Takeoff and Landing Transports



Wide Bodied Jet



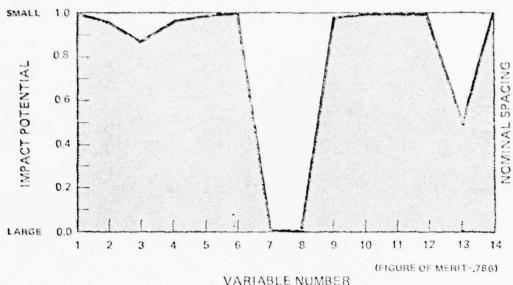
Variables

- 1. INTERFERENCE WITH IMPORTANT SPECIES 8. LOCAL GOVERNMENT ISSUES
- 2. AIR QUALITY
- 3. WATER QUALITY AND SUPPLY
- 4. ACCESS LOSS (RECREATION)
- 5. NATURAL RESOURCES
- 5. LAND RIGHTS
- 7. ECONOMICS

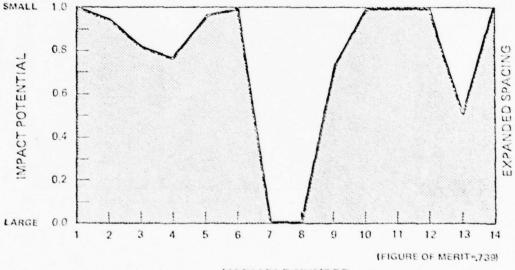
- 9. PUBLIC SAFETY
- 10. AIRWAYS IMPEDED
- 11. ARCHAEOLOGY
- 12. CONSTRUCTION MATERIALS (CEMENT)
- 13. ELECTRICAL ENERGY
- 14. NOISE

Figure 2 Air Mobile parametric impact analysis Project Summary

VERTICAL SHELTER, POINT SECURITY, FULL FORCE



VARIABLE NUMBER



VARIABLE NUMBER

- 1. INTERFERENCE WITH IMPORTANT SPECIES
- 2. AIR QUALITY
- 3. WATER QUALITY AND SUPPLY
- 4. ACCESS LOSS (RECREATION)
- 5. NATURAL RESOURCES
- 6. LAND RIGHTS
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- 9. PUBLIC SAFETY
- 10. AIRWAYS IMPEDED
- 11. ARCHAEOLOGY 12. CONSTRUCTION MATERIALS (CEMENT)
- 13. ELECTRICAL ENERGY
- 14. NOISE

Figure 3

Impact Profile - MPS option South Platte.

The peaks in these figures indicate relatively small impact potentials and the valleys represent relatively large impact potentials. Each figure summarizes the impact profile across a range of environmental concerns in a specific physical-biological region.

The sectors of the environment which contain large impacts range over the breadth of the 14 environmental variables of concern. For example, in the Texas-New Mexico Plains, water quality and supply, recreation and natural resources, archaeology and (for expanded spacing) economic and local government issues. In the South Platte Plains area, severe impact potentials are associated with economics and local government issues. Potentitals for major adverse impacts are related to increased demands for electrical energy, loss of access to recreational facilities and air and water quality.

By contrast the air mobile option shows the greatest potential for significantly impacting the environment adversely through the increased demand for electrical energy, increased noisé levels and its impact upon public safety. There are also potentially major impacts upon land rights, economics and local government issues. Finally air and water quality could be adversely affected. On the whole no single pattern of minor and major impact appears among the MPS impact profiles covering the seven study areas. The figure of merit for the air mobile impact profile is 0.74 and this value is bracketed by a range of all MPS figures of merit which range from as low as 0.52 to 0.84.

This lack of pattern and the wide range of figures of merit for MPS suggests that, within the range of siting variation, the air mobile option is roughly equivalent to an appropriately sited MPS. The "appropriated sited MPS," however, was the option with the least amount of potential for environmental damage. Such being the case, if the decision for a basing mode is between the air mobile option and the vertical shelter with point security, it appears as if the decision-maker is merely trading in one set of problems for another. Additional evaluation of these impacts will identify sitespecific or project mitigations which could change the peaks and valleys associated with the impact profiles.

Until such time as the additional evaluations for site-specific areas become available for public comment, it is not possible to adequately assess the impact of the project upon the state. Since the actual siting and the mitigating of adverse environmental impacts is the ultimate concern of this state, the state will withhold final comment on this project until the site-specific information becomes available. The state agency comments which follow relate more to the potential impact should parts of Kansas be selected for deployment. It is hoped that these concerns will be addressed early in the siting process.

LB:cms

STATE AGENCY A-95 1 ... SMITTAL FORM

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Kansas Department on Aging

610 WEST 10TH STREET, TOPEKA, KANSAS 66612

Phone 913-296-4986

JOHN CARLIN Governor of Kansas BARBARA J. SABOL Secretary

February 27, 1979

Mr. Paul DeGaeta A-95 Coordinator Division of State Planning and Research 4th Floor, Mills Building Topeka, Kansas 66612

Dear Paul:

Kansas, like most rural states, has a large percentage of elderly living in farm and non-farm rural areas. These elderly could be adversely impacted by the establishment of basing modes because of the possibility of displacement or because of the drain such installations would have upon power, water, and other supplies and materials.

Kansas has the fourth highest percentage of elderly in the country and it is the elderly who suffer most from forced displacement. While this department does not have the technical expertise to assess the full impact of this project in terms of land used and persons displaced, it is clear that some of our elderly population would lose their homes, the use of their land, and their ties to a familiar and stable environment. This, obviously, would work to their detriment because of a phenomenon called "transfer trauma."

Special consideration must be given to the elderly in reviewing this project.

Sincerely,

Barbara J. Sabol

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Secretary

BJS:pal

STATE AGENCY A-95 TRANSMITTAL FORM ON OF WATER Return to: Division of State Planning & Research, Department of Administration, Suite 50 Mills Building, Topeka, Kansas 66612 Ketification of Inc U.S.DEPT. OF THE AIR FORCE - AIR MOBILE DRAFT PROJECT TITLE: SUPPLEMENT to the FEIS, MX: Milestone II. Preapplication igal Application ROBERSH WIN DATE REVIEW PROCESS STARTED DATE REVIEW PROCESS ENDED 02-19-79 EXPEDITE 6832 - FEIS PART I Initial Project Notification Review (To be completed by Clearinghouse): The attached project has been submitted to the State Clearinghouse under the provisions of the Federal OMB Circular A-95 revised. Return by This form provides notification and opportunity for review of Expedite this project to the agencies checked below. Please fill in Add. Info. Avail. Part II and Part III below and return to the State Clearinghouse. REVIEW AGENCIES Aging Human Resources Agriculture - DWR Kansas Corporation Commission Park and Resources Authority Civil Rights Commission Social and Rehabilitation Services Economic Development SE00 = M State Conservation Commission Kansas Energy Office Forestry, Fish & Game Commission A Transportation+AVIATION Health and Environment Water Resources Board Historical Society Southwest Reg. Plng. Comm. Northwest Reg. Ping. Comm Div. of the Budget PART II Nature of Agency review comments (To be completed by review agency and returned to Ca Check one or more appropriate boxes. Indicate comments below. Attach additional sheet if necessary or use reverse side. Request clarification or additional info. Suggestions for improving project propos COMMENTS: The report does not give specific sites to be located in the State of Kansas. However, if such sites are recommended by the FSED studies, use of either groundwater or surface water would be subject to the Kansas Water Appropriation Act. K.S.A. 82a-728 of that act makes it unlawful for any person to appropriate or threaten to appropriate water without first applying for and obtaining a permit from the Chief Engineer, Division of Water Resources, and provides criminal penalties for violations thereof. If the construction of sites involves the change in course, current or cross section of any stream in Kansas, that work may be subject to K.S.A. 82a-301 to 305, inclusive. 17 FART III Recommended State Clearinghouse Action (To be completed by review agency and returned to Clearinghouse): Check one box only: Clearance of the project should not be Clearance of the project should be delayed but the Applicant should (in granted the final application) address or clarif Clearance of the project should be the questions or concerns indicated abov delayed until the issues or questions Request the opportunity to review the have been clarified by the Applicant final application prior to submission to the federal funding agency Div Div./Agency

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KDED

Reviewer's Name

Byron Wood

the federal funding agency

Date

3/5/79

sites would be used here. This would provide either new landing facilities or improvements to existing landing facilities which would be used only under actual attack. When found obsolete, the facilities could be used for private aviation.

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The document states that main operating bases and the alert fields will be existing military bases wherever possible, but the primary study area includes approximately 1/5 of Kansas in which no military bases exist. Should a site in this area be selected, major adverse impact on wildlife will result.

How can alert bases "co-use" civilian airfields when a minimum of 2 square miles of clear uninhabited area is required for each? Also, the minimum distances for towns could not be met.

FSED and Missile Flight Testing will have no impacts on Kansas fish and wildlife.

Kansas'wildlife resources are directly dependent on remaining permanently vegetated areas. Anything which further reduces critical habitats such as native prairie, native woodlands, natural stream systems, or wetlands also reduces the state's wildlife resource base. We oppose obligating large segments of land for any purpose which results in long-term losses of our remaining wildlife resources.

KANSAS FORESTRY, FISH AND GAME COMMISSION

ARTICLE XVII

NONGAME, THREATENED OR ENDANGERED SPECIES

23-17-1. General regulations

FIRST. The following species are declared to be endangered where found throughout the State of Kansas.

(1) Mammals

Black-footed ferret (Mustela nigripes)
Gray Bat (Myotis grisescens)

(2) Birds

Peregrine falcon (Falco peregrinus anatum)
Whooping crane (Grus americana)
Eskimo curlew (Numenius borealis)
Bald eagle (Haliaeetus leucocephalus)

(3) Fish

Neosho madtom (Noturus placidus)

Pallid sturgeon (Scaphirhynchus albus)

Sicklefin chub (Hybopsis meeki)

(4) Amphibian/Reptile

Central newt (Notophthalmus viridescens louisianensis)

Grotto salamander (Typhlotriton spelaeus)

Gray-bellied salamander (Eurycea multiplicata griseogaster)

Cave salamander (Eurycea lucifuga)

(5) Invertebrates

Small amphibious snail (<u>Pomatiopsis lapidaria</u>) no common name Warty-backed mussel (Quadrula nodulata) Heel-splitter mussel (Anodonta suborbiculata)
Fat pocketbook pearly mussel (Proptera capax)

SECOND. The following species are declared to be threatened where found throughout the State of Kansas.

(1) Birds

Prairie falcon (Falco mexicanus)
Least tern (Sterna albifrons)

(2) Fish

Blue Sucker (Cycleptus elongatus)

Arkansas darter (Esthe stoma cragini)

Topeka shiner (Notropis topeka)

(3) Amphibian/Reptile

Alligator snapping turtle (Macroclemys temmincki)
Northern crawfish frog (Rana areolata circulosa)

(4) Invertebrates

Riffle beetle (<u>Dubiraphia n. sp.</u>)
Riffle beetle (Optioservus n. sp.)

THIRD. Except as may be specifically provided by subsequent regulation thereto it shall be unlawful to:

- Export any threatened or endangered species of wildlife from this state;
- (2) take any threatened or endangered species of wildlife within this state, except that species designated as threatened or endangered in limited portions of their total range can be taken by legally described methods outside of such designated areas;
- (3) possess, process, sell or offer for sale, deliver, carry, transport, or ship, alive or dead, by any means whatsoever except as specified by state law any threatened or endangered species of wildlife.

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(5) Invertebrates

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This form provides notification						(X) Expedite	
this project to the agencies Part II and Part III below and r						Add. Info. Ava	il.
	REVIEW AGE:	NCIES					
Aging Agriculture - DWR Civil Rights Commission Economic Development Kansas Energy Office Forestry, Fish & Came Commi Health and Environment Historical Society Div. of the Budget		= 00	XZZ	Kans Park Soci Stat Tran Wate Sout	and R al and e Cons sports r Reso hwest	poration Commission desources Authority Rehabilitation Servicervation Commission detion ANIATION Durces Board Reg. Plng. Comm.	ices
PART 11 Nature of Agency review	comments (To be	comp1	ete	d by	revie	agency and returned	to 6
Check one or more appropriate box necessary or use reverse side. Request clarification or ad						or improving project	
Section 3.2.7 on page I	V-42 correctly d	lescrit	es	the p	otenti	al effects of this	
project on the archeological resou	rces of Kansas.	It sh	nou1	d be	noted	that the potential for	
adversely affecting archeological	sites, historic	build	ngs	, his	toric	trails, etc., would be	!
considerably less under the Air Mo	bile concept tha	in unde	er t	he mu	ltiple	protective structure	
options. Until specific plans are state's historic and cultural reso	poposed, the as urces remains co	sessme	nt	of th	e pote	ntial impact on the	
PART III Recommended State Clear returned to Clearinghou	inghouse Action	and the second		THE RESERVE	ted by	y review agency and	
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PROJECT TITLE:	U.S.DEPT. OF THE SUPPLEMENT to th	AIR FORCE - AIR ne FEIS, MX: Miles		RAFT []	Notification of Intent Preapplication Final Application
DATE REVIEW PRO	CESS STARTED	DATE REVIEW P	ROCESS E	DED	SAI NUMBER
	02-19-79	EXPEDI	TE		6832 - FEIS
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		REVIEW AGE	NCIES	`	
Economic Education Forestry, Health an Historica hiv. of t PART II Nature Check one or monecessary or us	thts Commission Development This is the Came Commission Th	oxes. Indicate c	omnents	Park and Social and State Con Transport Water Res Southwest Northwest ed by revie below. Att	rporation Commission Resources Authority d Rehabilitation Services servation Commission ation ources Board Reg. Plng. Comm. Reg. Plng. Comm. w agency and returned to Commission ach additional sheet if or improving project propose
CONCHENTS:	larification or a				al and vague fashion.
Considerable	discussion fo	cuses on labor	market	requiremen	nts outside Kansas.
However sho	ould Boeing Aero	space Corporati	ion be s	elected a	s the missile contrac-
					, labor market impact
most likely	will be signif	icant in Kansas	s direct	ly through	h the Boeing Plant in
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Reviewer's Intra		Div./Agend			Pate
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Continued: SAI Number 6832 - FEIS, U.S. DEPT. OF THE AIR Force - AIR MOBILE DRAFT SUPPLEMENT to the FEIS, MX: Milestone II.

Wichita. The AIR MOBILE DRAFT SUPPLEMENT does not effectively address labor transfer -- demand -- training requirements with regard to skills, training facilities, instructor availability, etc. Page II-22 makes reference to full employment through the mid 1980's, but does not address economic impact of full employment pressures. Table 3.1-1 provides no indication that Impact Aggregation includes recognition of Human Resource training requirements.

The Air Mobile concept appears to produce considerably less environmental impact than the MPS options. Either configuration, but particularly the MPS options, could require substantial numbers of persons to relocate from established rural areas in order to establish bases. The average age of Kansas farmers is 53 years. There is no assessment of impact on such persons who are in their latter productive years, but who possess specialized knowledge and experience only in agriculture and who would be too old to accept the financial burdens associated with establishing agricultural operations in a new location. There is no evidence that impact related to training such persons in other fields to make them productive after relocation has been considered. Any such retraining effort could not effectively be borne by local resources alone.

24

25

26

27

Figure 1-2 on Page IV-5 does not reflect the existence of the following Indían reservations in Kansas: Iowa in Kansas (Brown Co.); Kickapoo (Brown Co.); Pottawatomie (Jackson Co.); and Sac and Fox of Missouri (Brown Co.).

Utilization of the factor "market value of agricultural production per acre" on a one year sample (1974) is statistically unsound and unreliable for assessing impact potential of a program over 20 to 30 years. Depressed agricultural commodity prices and adverse weather conditions in Kansas in 1974 are not recognized in the narrative and certainly affect the data presented. The definition of parameters for establishing the Impact Profile for the MPS option in the South Platte area appears to be biased and/ or unrealistic with regard to water quality and supply, natural resources, human resources (retraining and relocation) and land rights. Excavation for the MPS option would significantly alter water tables, while recognition of prime agricultural land as an unrenewable natural resource is not taken into account, along with the land rights of the farm owners, measured in terms of total impact on the economy of the State of Kansas or the South Platte region.

THE STATE OF KANSAS

THE KANSAS STATE PARK AND RESOURCES AUTHORITY

503 KANSAS AVENUE, P.O. BOX 977

Phone (913) 296-2281 TOPEKA, KANSAS 66601 March 1, 1979

Mr. Paul DeGaeta A-95 Coordinator Division of Planning & Research Suite 407, 4th Floor Mills Building Topeka, Kansas

Re: A-95 Review of MX Missile Project

Dear Mr. DeGaeta:

In view of your latest request dated February 27, 1979 in reference to the MX Missile Project, the Kansas Park and Resources Authority will furnish a review comment. Our agency had opted to rely on our Health and Environment agency to comment on the project considering the project's magnitude. It appears, however, that the tremendous negative impact this project could have on the state of Kansas, a comment from this agency is indeed in order.

After review of the Environmental Impact statement and the many letters and newspaper articles opposing the possible location of the project in Kansas, there appears to be little that is left unsaid. However, we support the overall philosophy of former Governor Robert Bennett in his letter to The Honorable Jimmy Carter, President of the United States, dated October 2, 1978. Governor Bennett's summation of the negative impact on Western Kansas rangeland, groundwater reserves, Kansas people and energy requirements are startling realities that must be faced if Kansas should become the chosen site.

The letter from Governor John Carlin that followed on January 22, 1979 reiterated the concern of Kansans toward the missile program.

In retrospect, we would remind those concerned, of the negative reactions of the Kansas people to a proposed National Park suggested to be located in Kansas some years ago. Such opposition to the establishment of a national park in Kansas should reflect even more the opposition that Kansas citizens would feel toward the MX Missile Project.

It should be noted that the air Mobile Option would appear to have less impact on the environment than would the first proposal for ground-to-air missiles, however, this new option would still require a substantial area for establishment of an air base.

28

In lieu of water impoundments in western Kansas, recreation interests have been working toward recreation corridors along major streams oriented toward camping, hiking and recreation trails through Regional Planning efforts. It appears that such recreation would be in jeopardy as a result of the missile project being located in western Kansas. It would appear that the Greater Southwest Planning Commission and the Northwest Kansas Planning Commission should have an opportunity to comment on the missile project.

29

The Cimarron National Grasslands Area administered by the U.S. Forest Service located in Morton County is presently used as a recreation area and should be given consideration prior to any decision making.

30

In view of these and many other environmental considerations, this agency would go on record in opposition to the proposed location of the MX Missile Site in Kansas and the Air Mobile Option Draft Supplement EIS.

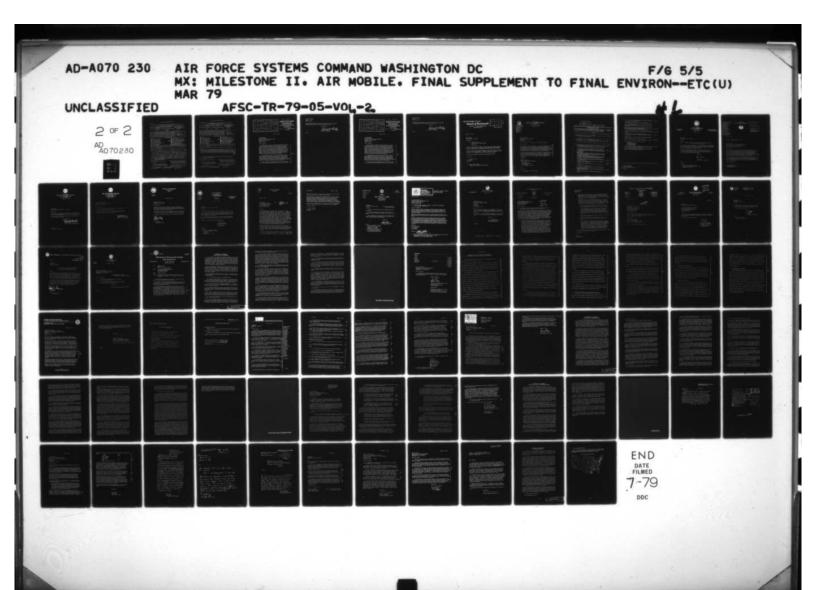
Sincerely,

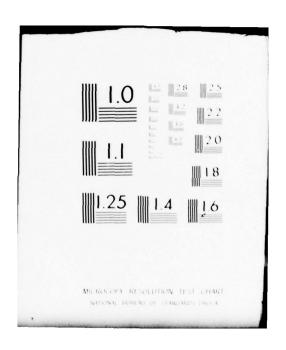
Wayne Herndon

Wayne Herndon Planning Coordinator

WH:bam

cc: Lynn Burris





Division of State Planni Nills	ng & Research, Departm Building, Topeka, Kans	ent of Ad	ministration, Suite 501
PROJECT TITLE: U.S. DEPT. OF THE SUPPLEMENT to the	AIR FORCE - AIR MOBILE FEIS, MX: Milestone	DRAFT	Notification of Intent Preapplication Final Application
DATE REVIEW PROCESS STARTED	DATE REVIEW PROCES	S ENDED	SAI NUMBER
02~19~79	EXPEDITE		6832 - FEIS
PART I Initial Project Notific	ation Review (To be co	mpleted b	y Clearinghouse):
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Check one or more appropriate be necessary or use reverse side. Request clarification or a COMMENTS:	additional info.	Suggesti	ons for improving project propo
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Reviewer's Name	Div./Agency	the reder	al funding agency

Division of State Planni Mills	ng & Research, Departs Building, Topeka, Kan		ration, Suite 501
	AIR FORCE - AIR MOBIL FEIS, MX: Milestone		Notification of Intent Preapplication Final Application
DATE REVIEW PROCESS STARTED	DATE REVIEW PROCE	SS ENDED	SAI NUMBER
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his form provides notificat his project to the agencie	s checked below.	Please fill in	X Expedite Add. Info. Avail.
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64 Agina	REVIEW AGENCIE		
Agriculture - DWR		Human Res	rporation Commission
Civil Rights Commission			Resources Authority
Economic Development	SEOO	Social an	d Rehabilitation Services
Kansus Energy Office			servation Commission
Forestry, Fish & Came Com	mission		ation+AVIATION
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Civil Aviation is an impo Western Kansas. This pro In addition, an adverse General aviation is advert development depends on or	ortant mode of transject would create economic impact wousely being restrict	sportation to an airspace h ild affect air ed by federal	ports in the area. mandates. Economic
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ART III Recommended State Cle returned to Clearingh		be completed t	y review agency and
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eviewer's Waste Ray Arvin, Director, Div.	Div./Agency of Aviation, KDOT	2-2	Date 1-79

CHETENNE	PAWLINS	DECATUR	NORTON	Jenitrie?	1 SMITH
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n: 6832

NORTHWEST KANSAS

PLANNING and DEVELOPMENT COMMISSION

410 North Pomeroy Street

Box 248 Hill City, Kansas 67642

(913) 674-2151

March 2, 1979

Mr. Paul DeGaeta A-95 Coordinator Division of State Planning and Research 5th Floor - Mills Building 109 West 9th Topeka, KS 66612

Dear Mr. DeGaeta:

Please consider this the A-95 review comment related to the MX Missile Project-Air Mobile Option. Without a definitive location for a site which affects the Northwest Kansas Planning and Development Commission it would be difficult to state a negative environmental impact. If we were to assume a site for the basing of the Air Mobile Option within the region encompassed by our Planning Commission, we think it would be reasonable to assume that it would have a very great impact as compared to an area which has an existing base and support population and facilities. When compared to the multiple protective shelters, the overall regional impact which would be detrimental to the basically agricultural economy would be negligent.

It would appear that either the multiple protective shelters or the Air Mobile Option would prove to be much more feasible in other areas indicated in the MX Missle Project studies. The agricultural intense economy reflected primarily by wheat and cattle production which exemplifies the Northwest Kansas Planning and Development region would be better maintained as and for agricultural food stuff production both from a standpoint of peace time or war time situations.

If there is any serious consideration given to this region within the five year engineering developmental period, we could then discuss 33

Mr. Paul DeGaeta Page 2 March 2, 1979

more definitive problems related to environmental impact and would certainly want to be a part of those study activities.

Sincerely,

ranze M. Gourley Executive Director

FMG:ck

CHEYENNE	PAWLINS	DECATUR	NOTTON	PHILLIPS	SMITH
Saint francis Bird City	Herndon McDonald & Alwood	Norcetur Oberlin Janningse Dresden	-Clayton Edmond	Phillipsburg Speed a Glad	Lebason Kessington Smith Center Athel
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WALLACE Wallace Sharon Springs	Winene Russell Springs	Grinnell® Pork Grainfield Quinte Gove	Tatgo Waterney Cellyer	Ettis Ettis Hays Victoria Schoonsher	

N: 6832

NORTHWEST KANSAS

PLANNING and DEVELOPMENT COMMISSION

Box 248

410 North Pomeroy Street
Hill City, Kansas 67642

(913) 674-2151

March 2, 1979

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Mr. Paul DeGaeta Page 2 March 2, 1979

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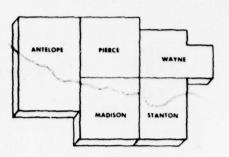
Sincerely,

Franze M. Garley
Executive Director

FMG:ck

MID-ELKHORN VALLEY Council of Governments

P. O. BOX 426 NORFOLK, NEBRASKA 68701 PHONE 402 379-1010



March 7, 1979

SAMSO/MMND Norton AFB, CA 92409

Gentlemen:

Re: SAI# 79 02 23

MX MISSLE AIR MOBILE DRAFT

EIS

Air Force

Under the provisions of OMB Circular A-95, this agency has conducted a regional level review of the application for federal funds for the subject proposal as submitted by the Air Force.

The proposed project does not appear to be in conflict with any regional level comprehensive plans and does not represent a duplication in the expenditure of state or federal funds.

This letter completes regional clearinghouse review.

Sincerely,

Rick Hamman,

Director

jcw

cc: Neoma Parks, SOPP

Deputy for Environment and Safety



BOARD OF TRUSTEES

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ELBERT R HILLIARD
DIRECTOR

STATE OF MISSISSIPPI DEPARTMENT OF ARCHIVES AND HISTORY P. O. BOX 571 JACKSON, MISSISSIPPI 39205

March 8, 1979

Dr. Carlos Stern
Deputy for Environment & Safety
Department of the Air Force
Pentagon
Washington, D. C. 20530

Re: Cl. #79030109, MX: Milestone II System, Multi Counties, MS

Dear Dr. Stern:

The Department of Archives and History has the responsibility under state law to protect State Archaeological Landmarks. Under federal law the department serves as the State Historic Preservation Office. In that capacity we advise federal agencies of their legal responsibilities under the National Historic Preservation Act, and comment on the impact of federally assisted or licensed projects on cultural resources.

34

In order to evaluate the impact of this project on cultural sites, we need to have certain information about the project. Please complete the enclosed form and return to us with a map indicating the project's location in relation to major landmarks of the area (highways, rivers, lakes, etc.) We will issue our comments soon after receiving this information.

Sincerely,

ELBERT R. HILLIARD State Historic Preservation Officer

By: Paul Newsom

Environmental Coordinator

Russon

PN/dm

Enclosure

cc: Clearinghouse for Federal Programs

FOR DEPARTMENT OF ARCHIVES USE

		Re: d				
		сне 79030109	N/E			
	,	Sgnt	Survey			
	5	Date	Other			
=	- 511					
		CULTURAL RE	SOURCE ASSESSMENT			
Th	e form	arding of this completed form to the Mississip	pi State Historic Preservation Officer constitu	es a request for a		
		esources assessment in accordance with 36 Cl				
Qu	irec fo	r all construction projects which will be funded,	, assisted, or licensed by a federal agency.			

1.	Appi	cont:	_ Street/F. O. Box:			
	City:		_ County:	Zip:		
		act Person:				
	Cont	act Person's address, if different from applicant's				
		Free!/P. O. Eox:	City:	7 ::		
	11 00	licant is not a federal agency to which federal	agency is applicant applying:			
	F	ederal Program: Circle ty	pe of assistance sought: Grant Loan	Other		
	Signo	ture of applicant or contact person requesting	this assessment:			
			Date			
_			9			
11.	1.	PROJECT DESCRIPTION: (If program involves	more than one project/activity, check here			
		and complete separate assessment form for e				
	•	Use the ideal and a deal and a de	-34 - 4 (1) 1	YESNO		
	2.	 Has the identical project been previously submitted for cultural resource assessment? (If yes, enclose copy of State Historic Preservation Officer's comments and disregard 				
		(If yes, enclose copy of State Historic Preservation Officer's comments and disregard remaining questions.)				
	3.	PROJECT LOCATION:				
	3.		indicating the precise location of the project			
		the state of the s	lives more than one project/activity, one map			
		indicating all projects is sufficient.				
		b. If the project is within city limits, give address				
		c. If the project is outside city limits, give o				
		Range description (not necessary if the pro	ject map contains the information):			
	4.	To your knowledge, has a cultural resources s	survey been conducted in the project area?	YESNO		
	4.	(If yes, attach survey report.)	orvey been combucted in the project died:			
	5.	 a. Will the project involve an addition to, or structure? If checking "no," proceed to iten 		YESNO		
		If yes,				
		b. Was affected structure built before World V	Var II? If checking "no," proceed to item 6.	yesno		
		If yes,				
		c. Who owns the structure?				
		d. What was the approximate date of constru	ction?			
		e. Attach snapshers of front and rear elevat	ions; another should indicate the location of			
		any proposed addition alteration. f. Have plans and specifications for the renov	ation observation or addition been completed?	vesno		
		If checking "no," proceed to item 6.	anon, whereinen, or addition been completed?			
		If yes	89			
		g. Attach pions. (Pians for a new structure to				
		ottoched.)				

6.	a. Will construction take place adjacent to structures which are approximately 50 years old one der? If checking "no," proceed to item 7. If yes.	YESNO
	b. Give addresses of structure(s), and if known, owner's name and telephone:	
	c. Give approximate dates of structure(s):	
	d. Attach snapshots of structures and on project map indicate their location in relation to the project.	
7.	Has the ground at the project location been previously developed, graded, or disturbed (other than in connection with any structure described in item 5)? If so, describe disturbed/developed portion and indicate on project map.	YESNO
8.	a. Will this project necessitate the acquisition of fill material? If checking "no," proceed to item 9	YESNO
	If yes, b. Approximately how many cubic yards of material will be acquired?	
	c. Has the site from which material will be acquired been selected? If checking "no," proceed to item 9. If yes,	no
	d. Indiate barrow area(s) on project map and give approximate acreage of each barrow site:	
	e. Has material been taken from the barrow area(s) for other projects?	vesno
•	a. Does this project involve road/street construction? If checking "no," proceed to item 10, if yes.	
	Give special attention to item 6, AND indicate on project map all: New right-of-way	
	2. New street/road construction	
	3 Street/road to be overlaid 4. Street/road to be widened	
10.	Will this project affect any property which is of apparent educational or scientific interest? If yes, describe the interest (geological, biological, etc.)	YESNO
1.	If necessary, elaborate on the above questions, and/or include any additional information which you think would be helpful in the review of this project.	



State of Missouri
OFFICE OF ADMINISTRATION
P.O. Box 809
Jefferson City 65102

William D. Dye, Director Division of Budget and Planning

March 9, 1979

SAMSO/MNND Norton AFB, California 92409

Gentlemen:

Joseph P. Teasdale

Governor

Subject: 79020084 (Air Mobile Draft Supplement to Final Environmental Impact Statement MX: Milestone II)

The Division of Budget and Planning, as the designated State Clearinghouse, has coordinated a review of the above referred Air Mobile Draft Supplement with various concerned or affected state agencies pursuant to Section 102 (2)(c) of the National Environmental Policy Act.

We are enclosing the comments received from state agencies for your consideration and appropriate action. The remaining state agencies involved in the review did not have comments or recommendations to offer at this time, and we waiver further review.

Sincerely,

Lais Pahl

Lois Pohl

Chief, Grants Coordination

LP:cm

Enclosure

cc: Deputy for Environment and Safety Office of the Secretary of the Air Force Washington, D.C. 20330 JAY B. DILLINGHAM, Chairman Rm. 126, Livestock Exchange Bldg. 1500 Genesee Karsaa City. 64102

JACK CURTIS, Vice Chairman 750 N. Jefferson Springfield 65803

A. C. RILEY, Member 701 Davis New Madrid 63869

ROY W. JORDAN, Member 100 N. Broadway St. Louis 63102

DANIEL W. DUNCAN, Member 2801 South Second St. St. Joseph 64503

ROY H. GOODHART, Member Commerce Bank of Hannibal Huck Finn Shopping Center Hannibal 63401

March 8, 1979

MISSOURI STATE HIGHWAY COMMISSION



ROBERT N. HUNTER, Chief Engineer

BRUCE A. RING, Chief Counsel

L. V. MCLAUGHLIN, Ass't. Chief Engineer

MRS. IRENE WOLLENBERG, Secretary

P. O. Box 270 Jefferson City, Missouri 65102 Telephone (314) 751-2551

GENERAL: Application No. 79020084 A-95 Review

Ms. Lois Pohl Coordinator of Local and Regional Planning Division of State Planning and Analysis State Capitol, P. O. Box 809 Jefferson City, Missouri 65101

Dear Ms. Pohl:

The Air Mobile Draft Supplement to the Final Environmental Impact Statement MX: Milestone II by the Department of the Air Force contains information indicating that the missiles under consideration will weigh between 60,000 and 160,000 pounds. There is no indication as to the mode of transportation of the missiles to the main operating bases. If some are to be transported by highway, there could be weight limit problems on those state routes, particularly some of the bridges.

It is suggested that more careful consideration be given to the method of transportation of the missiles under consideration to the main operating bases because such weights exceed considerably the legal and operating weight limits on state highways in the state of Missouri.

Very truly yours,

L. V. McLaughlin Assistant Chief Engineer A-95 Review Agent



STATE OF NEVADA GOVERNOR'S OFFICE OF PLANNING COORDINATION CAPITOL COMPLEX CARSON CITY, NEVADA 89710 (702) 888-4865

March 12, 1979

SAMSO/MNND Norton Air Force Base, Ca. 92409

Dear Sirs:

The Nevada State Clearinghouse has reviewed the Air Mobile Draft Supplement to the FEIS, MX Milestone II.

The agencies that reviewed the Draft EIS Supplement had no negative comments.

Sincerely,

Robert Hill

State Planning Coordinator

JS:RH:aw cc: Dr. Carlos Stern



The Nevada State Museum

CAPITOL COMPLEX

CARSON CITY, NEVADA 89710

Telephone (702) 885-4810

March 6, 1979

Dept. of the Air Force Office of the Assistant Secretary Washington, D.C. 20330

Dear Dr. Stern:

We have received one copy of the Air Force's Air Mobile Draft Supplement to the FEIS, MX: Milestone II.

There appears to be no direct effects upon the natural and cultural resources in the State of Nevada. Therefore, we tender a "no comment" response to your your final EIS.

Donald R.

Donald R. Tuohy Curator of Anthropology

cc C. Zeier, SHPO



STATE OF NEW MEXICO OFFICE OF THE GOVERNOR SANTA FB 87803

BRUCE KING

February 28, 1979

Dr. Carlos Stern Department of the Air Force Washington, D.C. 20330

Dear Dr. Stern:

Thank you for your letter of February 2 regarding the supplement to the Final Environmental Impact Statement on the M-X Milestone II. Your letter was not received in this office until February 12, and therefore, your deadline of February 10 could not be met.

We understand that your staff has communicated directly with our State Clearinghouse and has obtained the information your letter requested.

Your interest in keeping us advised about this program is appreciated.

Sincerely,

BRUCE KING Governor

cc: SAMSO/MNND

Norton AFB CA 92409



BRUCE KING GOVERNOR

DAVID W. KING

STATE OF NEW MEXICO

DEPARTMENT OF FINANCE AND ADMINISTRATION PLANNING DIVISION

ANITA HISENBERG

505 DON GASPAR AVENUE SANTA FE, NEW MEXICO 87503 (505) 827-2073 (505) 827-5191

March 12, 1979

SAMSO/MNND Norton Air Force Base, California 92409

Gentlemen:

Re: Air Mobile Draft Supplement to FEIS, MX: Milestone II, SAI# 79 07 1 086

Attached you will find comments from the Natural Resources Department. Their comments substantially represent the State Planning Division's position on the subject document. We, of course, may have more extensive comments on the project as the decision process proceeds.

The Division submitted the subject EIS to the Energy and Minerals Department and the Health and Environment Department for review. Neither agency had comments.

Thank you for the opportunity to review this document.

Very truly yours,

Jack M. Mobley
Planning Bureau

JMM: JEH

Attachment

cc: Deputy for Environment and Safety
Office of the Secretary of Air Force
Room 4C885
The Pentagon
Washington, D.C. 20330



STATE OF NEW MEXICO NATURAL RESOURCES DEPARTMENT SANTA FE 87503 13051 827-3167

WILLIAM S. HUEY

March 6, 1979

Kate Wickes
Department of Finance
and Administration
State Planning Division
505 Don Gaspar Ave.
Santa Fe, NM 87503

-for

SAMSO/MNND Norton Air Force Base California 92405

Dear Kate:

We have reviewed the Air Mobile draft supplement to final environmental impact statement MX: Milestone II. Based upon the maps and charts which show the various project boundaries, the criteria for the distance from open sea, from cities of 25,000 or over, from protected land such as National Parks, etc., and the altitude requirements, we find that this project will have only a limited effect on the State of New Mexico. Since the environmental impact analysis is not site specific, it seems that the only possible impact on New Mexico would be some project evaluation and testing at Kirtland Air Force Base, and the slight possibility of one alert base and several dispersal sites within our State boundaries. In terms of endangered animals and plants, the Air Force seems to have charted out the critical habitat and plans to avoid that habitat. Further, the Air Force has studied the effects of this option on wildlife and they appear to be minimal.

The use of existing air bases, some civilian airports and dispersal sites on such things as landing strips, roads or dried lake beds would do minimal damage to existing agricultural lands. Noise levels should not be significantly different than the current noise levels of those airports already in operation.

The idea of placing alert-base operations at some civilian airports as well as some dispersal sites at small civilian airports may have the very positive effect of upgrading civilian facilities which would benefit the overall population and reflect very well on the Air Force. Joint use and joint maintenance of such facilities would be a savings to the taxpayer.

As a Department position we would support the air mobile alternative to the MX: Milestone II program over the buried trenches, vertical shelters, horizontal shelters and pools which all provided for the ground transportation of missiles among protective structures. In our areas of responsibility, the air mobile option does far less environmental damage and less damage to the supply, harvest and economic yield of our natural resources.

Thank you for the opportunity to comment on this draft supplement of the ${\tt MX}$: Milestone II Final Environmental Impact Statement.

Sincerely yours,

William S. Huey

Secretary

State Board of Health

OTHO R WHITENECK D.D.S. PRESIDENT

ROBERT D. McCULLOUGH, D.O., VICE PRESIDENT

HAROLD A TOAZ SECRETARY

GLEN L BERKENBILE M D

WALLACE BYRD M.D.

THOMAS DONICA, M.D.

EUGENE A OWENS M.D.

WA "TATE" TAYLOR



Oklahoma State Department of Health

Northeast 10th Street & Stonewall Post Office Box 53551 Oklahoma City, Oklahoma 73152

February 28, 1979

SAMSO/MNND

Norton AFB, California 92409

Gentlemen:

Re: Air Mobile Draft Supp.

FEIS on MX: Milestone II

JOAN K. LEAVITT, M.D.

We have reviewed the Air Mobile Draft Supplement FEIS for MX: Milestone II.

While this supplement is not and cannot be site specific, it appears consistent with Oklahoma requirements and in concert with our views.

Minor concerns could arise upon selection of individual deploy locations and would have to be addressed at that time; however, the overall treatment appears sound and adequate.

Sincerely,

John W. Gallion, Chief Air Quality Service

JWG: PL

- cc Deputy for Environment & Safety Office of Secretary of Air Force Room 4C885, The Pentagon Washington, D. C. 20330
- cc Pete Reed, Administrative Assistant to the Governor of Oklahoma
- cc Mark Coleman, Deputy Commissioner for Environmental Health Services



General Land Office

AUSTIN, TEXAS 78701 DOB ARMSTRONG, COMMISSIONER

Environmental Management Program 1700 North Congress Austin, Texas 78701

March 14, 1979

Mr. Ward Goessling, Jr. Governor's Budget and Planning Office Executive Office Building 411 West 13th Street Austin, Texas 78701

Re: Draft Environmental Impact Statement: Air Mobile Draft Supplement to the FEIS, MX: Milestone II

Dear Mr. Goessling:

The above referenced draft supplementary document has been reviewed by the General Land Office (GLO) as requested in your memorandum of February 26, 1979. We find that Texas is not included in the primary study area of the air mobile basing mode alternative, but the State is shown as a part of the expanded study area.

The impact analysis indicates that the air mobile basing alternative has a lesser physical impact on Texas than on other states that are within the study ATERS.

The draft supplement states that an environmental program will be conducted by the Air Porce during the five-year period planned for the MX Pull-Scale Engineering Program. This environmental program will include preparation of two environmental impact statements (for public review and comment) in addition to the Milestone II Final Environmental Impact Statement. When these EISs are made available, we will make more precise comments, especially as to how the program might impact state-owned lands managed by the General Land Office in Texas.

Sincerely,

J. Bishop

512/475-1540

Approved:

Mike Hightover

Program Manager/Director

100

Deputy for Environment and Safety, Office of the Secretary of the Air Force Room 40885, The Pentagon, Washington, D.C. 20330 SAMSO/MIND, Norton APB, California 92409



OFFICE OF THE GOVERNOR

WILLIAM P. CLEMEN IS, JR.

GOVERNOR

March 8, 1979

Carlos Stern, Ph.D
Deputy for Environment and Safety
Office of the Secretary of the
Air Force
Room 4C885
The Pentagon
Washington, D.C. 20330

Dear Dr. Stern:

The Air Mobile Draft Supplement to the Environmental Impact Statement (FEIS) MX: Milestone II, prepared by the Department of the Air Force has been reviewed by the Budget and Planning Office and interested State agencies.

The comments of the reviewing agencies are enclosed for your information and use. If this Office can be of further assistance, please contact me.

Sincerely.

Tom B. Rhodes, Director
Budget and Planning Office

Enclosures

TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue Austin, Texas

TEXAS WATER DEVELOPMENT BOARD

A. L. Black, Chairman John H. Garrett, Vice Chairman Milton T. Potts George W. McCleskey Glen E. Roney W. O. Bankston



Harvey Davis Executive Ducetor March 6, 1979 TEXAS WATER COMMISSION

Felix McDonald, Chauman Dorsey B. Hardeman Joe R. Carroll

Mr. Tom B. Rhodes, Director Governor's Budget and Planning Office Executive Office Building 411 West 13th Street Austin, Texas 78731

Dear Mr. Rhodes:

RECEIVEL

HAR 8 1979

Budget/Planning

Re: U.S. Department of the Air Force--Air Mobile Draft Supplement to Final Environmental Impact Statement Relative to MX: Milestone II.

In response to your February 26 memorandum, the Texas Department of Water Resources (TDWR) has reviewed the subject draft supplementary document which is a generic and programmatic analysis of the probable environmental and socio-economic impacts of the "air mobile" basing mode alternative for the new intercontinental ballistic missile (ICBM) referred to as MX. The "multiple protective structure" basing mode alternatives were addressed in the final environmental impact statement on MX: Milestone II, dated September 30, 1978. TDWR offers the following staff review comments on the subject supplementary document, from the standpoint of TDWR's statutory statewide responsibilities involving planning, development, and regulation of water resources, including water quality, industrial solid wastes, flood control, and wastewater treatment and disposal:

1. Because the subject document is essentially a programmatic and generic assessment of a proposed substantial refinement in aircraft and missile systems technology, and a new weapons system deployment strategy, the broadly-stated problems presented therein at this stage or project formulation tend to be complex and amorphous, thus making the delineation of their dimensions, relationships, and probable impacts a monumental task. Under these conditions, it is found difficult to differentiate between policy and program development, and the resulting probable impacts. Therefore, TDWR believes that more specific review comments could be made only after a more advanced stage is reached in the Full-Scale Engineering Development (FSED) phase, and after specific areas and bases are selected for deployment of the operational system. In this regard, TDWR notes the statements on pages iii and IV-112 that during the five-year MX FSED program, the U.S. Department of the Air Force will conduct an environmental program which includes the preparation of two environ-

Mr. Tom B. Rhodes March 6, 1979 Page Two

mental impact statements (EISs) (i.e., a deployment area selection EIS and a deployment EIS) in addition to the already completed Final EIS on MX: Milestone II, and the subject supplement. The additional EISs will reflect the progress made during the FSED phase and "will provide additional opportunities for public review and comment."

- 2. The impact analysis of air mobile basing option, involving a system of transport aircraft and air bases, indicates that while it is not a riskless operation, it has a relatively lesser physical impact on the State of Texas than on other portions of the proposed deployment zones of the United States. This tentative conclusion is based on our general assessment of the following data presented in the draft supplement:
 - a. The State of Texas is not included in the "Primary Study Area" of the air mobile basing mode alternative; the State is shown as part of the "Expanded Study Area". (See pp. I-12, I-12A, IV-3, and IV-5).
 - b. To the maximum extent possible, existing military airbases will be used for the Main Operating Bases and Alert Bases. Joint use of civilian airfields for Alert Base purposes will be considered. Existing airfields or appropriate existing adaptable surfaces will be used for Dispersal Sites. Construction of new bases and facilities and the acquisition of land will be kept to a minimum. (See pp. 1-9, 1-15, 1-16).
 - c. Impacts of Alert Bases on surrounding existing land uses are expected to be minimal. (See p. IV-2).
 - d. Effort will be made not to locate Main Operating Bases in areas having major physical or legal water restraints. (See pp. I-12A, IV-107).
 - e. Analysis of Chapter IV and Appendices A,B, C, and D of the subject draft supplement indicate that reasonable and adequate consideration has been given to all feasible measures to mitigate probable adverse environmental and socio-economic impacts, and that major unresolved issues requiring further study have been identified. Analysis indicates that the State of Texas is in a natural resource zone regarded as having good to moderate flexibility to point mitigations to permit the adjustment of boundaries and alignments required for the establishment or development of airbases and other support facilities for the air mobile basing concept. (See pp. C-4, C-5).

TDWR appreciated the opportunity to review the subject draft supplementary document. Flease advise if we can be of further assistance.

Sincerely yours,

Harvey Davis Executive Director

TEXAS AIR CONTROL BOARD

8520 SHOAL CREEK BOULEVARD AUSTIN, TEXAS 78758

JOHN L. BLAIR Chairmen LHARLES R. JAYNES Vice Chairman

BILL STEWART, P. L. Executive Director

512451 571

WILLIAM N. ALLAN JOE C. BRIDGEFARMER, P. E. FRED HARTMAN D. JACK KILLAN, M. D. OTTO R. KUNZE, Fb D., P. E. FRANK H. LEWIS WILLIAM D. PARISH

March 6, 1979

HECEIAER

Mr. Ward C. Goessling, Jr. Coordinator
Natural Resources Section
Budget and Planning Office
Office of the Governor
411 West 13th Street
Austin, Texas 78701

Dear Mr. Goessling:

The Draft Environmental Impact Statement: Air Mobile Draft Supplement to the FEIS, MX: Milestone II is consistent with the State Implementation Plan.

Smiceyely,

Roger R. Wallis, Deputy Director Standards and Regulations Program

cc: Mr. Fugene Fulton, Supervisor, Waco



RECEIVED MAR 8 1979 Budget/Planning

COMMISSION

REAGAN HOUSTON CHAIRMAN DEWITT C GREER CHARLES E SIMONS

STATE DEPARTMENT OF HIGHWAYS AND PUBLIC TRANSPORTATION

AUSTIN. TEXAS 78701

March 5, 1979

ENGINEER-DIRECTOR B L DEBERRY

D8-E 854

Air Mobile Environmental Impact Analysis Process

Mr. Ward C. Goessling, Jr., Coordinator Natural Resources Section Governor's Budget and Planning Office 411 West 13th Street Austin, Texas 78701

Dear Sir:

Thank you for your memorandum dated February 26, 1979 providing an opportunity to comment on the draft supplement covering the analysis of an air mobile basing concept.

The Department has no comment to offer.

Sincerely yours,

B. L. DeBerry Engineer-Director

R. L. Lewis, Chief Engineer

of Highway Design



DEPARTMENT OF ECOLOGY

Olympia, Washington 98504 206/753 280 Mail Stop PV-11

February 26, 1979

Commanding Officer SAMSO/MNND Norton AFB, California 92409

Dear Sir:

The Washington State Department of Ecology has reviewed the Department of the Air Force's draft environmental impact statement supplement entitled "MX: Milestone II."

We have no comments to offer.

Sincerely,

T. L. Elwell

Environmental Review Section

TLE:bjw

cc: Carlos Stern, Pentagon Mike Mills, Governor's Office



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Anthony S. Earl Secretary

MADISON, WISCONSIN 53707

March 6, 1979

IN REPLY REFER TO: 1600

SAMSO/MNND Norton Air Force Base California 92489

> Re: General Summary - Draft Air Mobile Supplement to Final Environmental Impact Statement Mx: Milestone II (Administrative Action)

Gentlemen:

The Wisconsin Department of Natural Resources has completed its review of the Draft Air Mobile Supplement to the FEIS. Specific sites were not addressed within this document although Wisconsin was included with the States listed as "Primary Air Mobile Study Areas". We understand that further information would be made available upon completion of the Full Scale Engineering Development (FSED) phase, and the specific site selection process would involve separate environmental impact statements.

In order to avoid or minimize any unforeseen environmental conflicts prior to release of a Draft EIS, you should anticipate contacting the Department of Natural Resources early in the planning and development of any prototype system, Main Operative Bases (MOB's), alert bases or dispersal sites to be located in Wisconsin. Thank you for the opportunity to review and comment on this Draft Supplement.

Anthony Secretary

incerely.

cc: Paul Swain - CAPITOL

Dr. Carlos Stern



WYOMING EXECUTIVE DEPARTMENT CHEYENNE

ED HERSCHLER GOVERNOR

March 5, 1979

Carlos Stern, Ph.D Deputy for Environment and Safety Department of the Air Force Washington, D.C. 20330

> Re: MX Milestone II Final Environmental Impact Statement

Dear Mr. Stern:

Enclosed are late comments received in our office for your information.

We are sorry for the delay of these comments and will further any others that we receive.

Sincerely,

State Planning Coordinator's Office

CO:mee



ED HERSCHLER GOVERNOR

Department of Environmental Quality Water Quality Division

HATHAWAY BUILDING

CHEYENNE, WYOMING 82002

TELEPHONE 307 777-7781

MEMORANDUM

TO:

Robert E. Sundin

Director

Dept. of Environmental Quality

FROM:

Frank Harman Frank R. Harman

Environmental Engineer Water Quality Division

DATE:

February 28, 1979

SUBJECT

Review of Final Draft of Air Mobile Supplement to Draft of Environmental Assessment for MX: Milestone II, Dept. of the

Air Force

Due to other pressing work in our division, I regret the slight delay in submitting comments on the above subject.

A review was made of the document covering the environmental impact analysis process. It was determined that the project did consider its environmental impact and the social and economic effects in specific regions where construction is to occur.

The key environmental issues involved such as energy, water and air qualities were considered and discussed. Water pollution was not included among these. It is known that the YC-14 and YC-15 aircrafts use Mono-methyl-hydrazine as a propellent. It is also a known fact that this propellent is very highly toxic in small quanties and is carcinogenic. Adequate and special precautions should be taken to prevent personnel from inhaling it or accidental spills occurring in storage. An organized hazardous material spill contingency plan should be prepared. Also, the Industrial Hygiens personnel should conduct special training programs on its use and care for personnel who are in contact with the Hydrazine on a day to day basis.

RESPONSE TO COMMENTS FROM STATE/LOCAL AGENCIES

- 14. Location of Air Mobile Alert Bases and dispersal sites is dictated to a large extent by the requirement that these facilities provide for survival against an SLBM attack. The Central U.S. area meets this general requirement for Alert Bases and primary dispersal sites. Within this area a large portion of land use is agricultural. Therefore, if one examines the available area in which one might locate a facility, agricultural lands would very likely be chosen. The total land requirements are expected to be no more than 20 to 50 mi². Specific sites will not be chosen until additional technical environmental studies are performed.
- 15. The Air Force regrets the short comment period for the Air Mobile Draft Supplement. This procedure was agreed to by the Council on Environmental Quality (CEQ). The short comment period has required an unusual effort on the part of all interested parties, and we appreciate the help your comments provided. Future requests for comments on environmental analysis (including A-95 review) will allow a longer comment period whenever possible.
- 16. The state of Kansas will be invited to express its views concerning potential issues that should be emphasized in the Deployment Area Selection EIS.
 - 17. The Air Force will comply with all applicable laws.
- 18. Sensitive biological areas were considered in projecting potential air mobile impacts as compared to the impacts of other basing modes. Such areas will influence base site selection and will be assessed in greater detail in the environmental analyses prepared for site selection decisions.
- 19. The black-footed ferret (Mustela nigripes) is an endangered species and areas where they may exist will be taken into consideration during the site selection process.
- 20. The list on page D-2 contains only Federally-listed species in North-Central CONUS. State and Federally listed species will be considered during siting studies. The Kansas list, as provided, has been included in this supplement.
- 21. The 2 sq. miles would be the area required for a new base, including runway and taxiway. For "co-use" on an existing base, the area required would be much smaller-just that for an alert parking ramp and support facilities. Application of distance criteria is discussed in para. 1.3.3.
- 22. Any further environmental studies concerning Kansas will be forwarded to the state for review.
- 23. It is true that if Boeing is selected as a missile or aircraft contractor, the corporation's Wichita facility could do some subcontracting and therefore impact upon the labor reserve in Kansas. The EIS does note that aerospace manufacturing activities in several parts of the Nation can

be affected by probable subcontracting. The extent, nature and location of these impacts cannot yet be described in detail.

- 24. The air mobile concept certainly produces different environmental impacts than MPS options. Whether the impacts are "less" depends upon which impacts are considered. In any event, the Air Force does not anticipate that most MPS or air mobile options will require a "substantial number of persons to relocate from established rural areas," or from anywhere else as a consequence of base construction. The two types of security selected for MPS basing may further minimize some impacts, but a decision has not yet been made. In any event, as this EIS explains, no final site selection will be made until after another EIS is completed; an EIS examining the possible impacts and the means of mitigation available. Details of the nature you mention would be addressed.
- 25. Although it may not appear so on the representative map on Page IV-5 of the Draft Supplement all Indian reservations will be excluded from MX siting. See also Page IV-41.
- 26. The 1974 agricultural data is the most recent data available from the U.S. Department of Commerce Census of Agriculture. It also presents comparable data in the same format for the entire nation. Although 1974 may not be a typical year for agriculture in Kansas, the 1974 agricultural data was used because it was the best available data to permit comparisons among basing modes. A deployment area selection EIS will address agricultural issues in great detail and will use the most current and available agricultural information.
- 27. The Air Force does not agree that the basic environmental variables used as indices of anticipated concerns are "biased and/or unrealistic" with respect the water quality and supply, natural resources and land rights. Without any explanation as to what it is claimed that the Air Force has overlooked, it is not possible to comment further. However, the Air Force anticipates that the scoping process required prior to preparation of the siting EIS will reveal other considerations which should be taken into account.

The Air Force has not, as suggested, considered every aspect of the impact on human resources of MX siting. It appears that MX siting may cause the displacement of some citizens regardless of the geotechnically suitable area of the nation that might be chosen. However, the purpose of this analysis is not to perform detailed planning in each area, but to evaluate in a general sense comparative impacts among basing modes so that significant impacts entailed by each are understood.

- 28. Existing facilities (military bases and co-use of civilian airfields) would be used to the maximum extent. The Air Force might require acquisition of small amounts of land for runway extensions and for establishment of a clear zone or for other limited purposes.
- 29. The Air Force will consider and attempt to mitigate impacts on recreation interests in selecting candidate MX deployment area. It is premature to suggest that "recreation corridors along major streams in Western Kansas"--or any other areas--"would be in jeopardy" if this region is

selected as a deployment area. Should Kansas be included in a candidate deployment area, the Greater Southwest Planning Commission and the Northwest Kansas Planning Commission will have an opportunity to comment on the missile project.

- 30. Designated National Grasslands as a category are excluded from consideration as siting areas for MX (See Volume IV, page IV-28 of the MX:Milestone II FEIS.)
- 31. The resources of all states are important. If an air mobile option is selected as the MX basing mode, the system cannot be sited in the western deserts, but must be located in the central CONUS. If the MPS basing mode described in the MX: Milestone II FEIS is the one selected, then what you suggest would be possible and would be considered during the site selection process.
- 32. Flying operations would normally be limited to crew training and cargo transport missions. Little, if any, impact is foreseen on general aviation.
- 33. It does appear that construction of new bases would have greater impact potential than use of an existing base and for this reason the Air Force is attempting to make maximum use of existing facilities. When compared to MPS with area security, both Air Mobile and MPS with point security would have substantially less impact potential on the regional production of foodstuff. As locations for serious consideration are identified during the five-year FSED phase, local, regional, state, and federal agencies responsible for the areas would be consulted relative to specific problems related to potential environmental impact.
- 34. This Supplement is a generic evaluation of an alternative means of basing the MX missile. No sites have been selected to date so it is not possible to complete the Cultural Resource Assessment form. The Air Force fully intends to comply with all applicable laws and regulations with respect to cultural resources.
- 35. The current concept does not envision transportation of missiles on public roads.
- 36. Appropriate mitigation measures for all potential impacts of a site-specific nature, such as those you suggest, will be developed during FSED. These mitigation measures will include an organized hazardous material spill contingency plan and appropriate training for all personnel.

NATIONAL ORGANIZATIONS

CENTER

1751 N STREET, NW WASHINGTON, DC 20036 202 872-0670

FOR

LAW

AND

SOCIAL

POLICY

12 March 1979

James N Barnes
Randy I Bellows
Nancy Duff Campbell
Curtos E Curtis
Roger S Foster
L Thomas Galloway
John W Garland
Marcia D Greenberger
Margaret A Kohn
J Davitt McAteet
Leonard C Meeker
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Carol Oppenheimer
Marilyn G Rose
Andrew Jay Schwartzman
Herbert Semmel
Alloriews at Law
Not admitted in D C

Dr. Carlos Stern
Deputy for Environment and Safety
Department of the Air Force
Washington, D.C. 20330

Dear Dr. Stern:

Comments are enclosed regarding the Air Mobile Draft Supplement EIS on the MX Missile, on behalf of the organizations listed below.

Yours sincerely,

James N. Barnes Leonard C. Meeker

Center for Law and Social Policy 1751 N Street, NW Washington, D.C. 20036 (202) 872-0670

Counsel for:

Federation of American Scientists Environmental Action Council on Economic Priorities Environmental Action Foundation

12 March 1979

COMMENTS ON AIR MOBILE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR MX MISSILE

These comments supplement those in our submissions dated March 28, 1978 and August 30, 1978.

The major environmental impact of the MX missile deployment -regardless of basing mode -- is the extent to which it draws, and
redirects, enemy fire upon the United States by requiring a retargeting of adversary warheads and by inducing a multiplication
of those targeted upon U.S. territory.

The Administration has seen fit, in this and other MX basing impact statements, to completely ignore this dominant impact. In this regard, its behavior is ostrich-like because the public -- having been warned by DOD authorities that certain areas might be used as "nuclear sponges" -- is ready to make its own environmental assessment. By pretending that such assessments are either unnecessary, or premature, the Administration only denies itself the advance warning it needs to determine which, if any, of these basing schemes might be acceptable to the public. And since public acceptance may well be the decisive issue in MX basing, nothing could be more short-sighted.

We are concerned about the limited scope of the Air Mobile

Draft Supplement to the Final Environmental Impact Statement "MX

Milestone II." If such analyses are not completed in a comprehensive

way at the earliest possible point in a development program, they

can have little or no impact on later decisions concerning planning for full production. The NEPA process loses much of its value if it does not produce analyses that are useful to decision—makers.

Unfortunately, the present Air Mobile Environmental Impact Statement complies only with the narrowest interpretation of the law. By restricting all evaluation to the "Full Scale Engineering and Development" Milestone of the program, it fails to address the critical question of the Environmental Impact of a deployed air mobile MX system. We are aware that the Air Force intends to complete and release an Environmental Analysis that will evaluate production and deployment of candidate systems after the second Milestone is passed. But that report will be made only after the most basic, and thus the most important decisions, regarding the choice of a deployment option have been made. As a result, the EIS will not be a part of this initial decisionmaking process. If a significant investment is made in developing an environmentally flawed program, it will be that much easier for decisionmakers to ignore potential environmental impacts rather than to redirect the program.

As we pointed out in our last submission, a U.S. decision to deploy a highly accurate, multi-warhead missile could lead the U.S.S.R., feeling that its land-based missiles were threatened,

to respond with a multiple aim point system of their own, thus resulting in a significant escalation of the arms race. The environmental and arms control implications of such a scenerio should be addressed in an EIS before final decisions on the program are made. In addition, it seems very short-sighted not to analyze (1) the overall implications for arms control efforts, now and in the future, of a decision to move forward with the MX program, and (2) the economic impacts and implications of the program.

Finally, as discussed in our last set of comments, the alternative of deploying MX missiles in submarines, including the Trident II, should be addressed in an EIS. We urge that no decision be made on MX until this alternative is thoroughly considered. In this connection, we wonder what recommendations the Defense Science Board and MIT Review Team (composed of Michael Callahan, Bernard Feld and Kosta Tsipis) have made regarding MX during the last year.

In addition to these general comments, we recommend that each of the issues below be discussed in relation to the overall impact of the possible deployment of an MX Air Mobile system.

I. Environmental Impact of an Attack on Alert Bases

As described in the Air Mobile EIS, in times of national emergency, missile-carrying aircraft would be disbursed to a large number of alert bases which would be constructed at existing

civilian airfields around the country. However, this EIS fails to discuss whether the Soviets would consider an attack upon these bases as an option in nuclear war or what the consequences of such an attack would be on the surrounding population and environment. Issues that should be addressed in this regard include:

- (1) Whether MX basing would encourage Soviet planners to target areas not already assumed to have been targeted in the past?
- (2) Whether, in the event of a counterforce attack on MX alert bases, there would be a significant increase in the number of immediate casualties as compared to an attack on Minuteman?
- (3) Whether an attack on MX alert bases would result in a significant increase in the amount of fallout within the U.S. as compared to present systems, under (a) a Soviet counterforce attack, and (b) a general spasm war in which civilian and military targets were attacked?
- (4) What the long-term environmental effects of an attack on MX alert bases would be, considered in terms of the impact on the area's post-attack viability?

Since community acceptance of an MX Air Mobile deployment will be directly related to the answers to the above questions, people have a right to know, at the program's inception, what sorts of risks are involved in the program's deployment. This should be evaluated in the EIS.

It does appear that the land impacts of the Air Mobile system will be substantially less than the other basing modes under consideration, and that verification issues would be easier because of the visibility of the carrier planes to reconaissance satellites.

II. Danger of Nuclear Accident

Because the Air Mobile MX will be in an environment filled with other aircraft -- civilian and military, friendly and hostile -- the chances that an accident may occur are possibly much greater than the ground-based MX. In any event, such dangers as sabotage and accidental detonation should be evaluated now, so that they can be considered in the initial decisionmaking concerning whether it is feasible to pursue this alternative.

III. Effects on Inflation

Although in Part II, Section 3.3 the MX EIS does stress the importance of analyzing the economic effects of production of Air Mobile carriers, it fails to analyze the inflationary effects of expenditures on the entire system. The aerospace industry, the primary initial benefactor of the planned expenditures, is currently operating at high-capacity with very low rates of unemployment among the skilled production workers, scientists and technicians that make up the aerospace workforce. A further infusion of procurement expenditures is very likely to exacerbate the inflationary

tendencies emanating from this sector. Further inflation will both reduce the economic benefits to the aerospace industry and impose costs on the larger community. Without more adequate planning, the Air Force is liable to encounter unexpected increases in costs and unforseen negative effects on the environment. We note that the Air Mobile option will cost over \$40 billion according to current estimates.

IV. Post-Production Planning

Although the EIS analyzes the preproduction and production phases of the Airborne Mobile basing system, it fails to analyze the recovery from production. Just as the creation of a production base has a serious environmental impact, so too does its dissipation. The Air Force should thoroughly analyze the costs of post-production adjustment and formulate plans for the alternative use of the resources that would be made idle. The aerospace industry has been characterized by large and rapid fluctuations in its production, due in part to poor planning. When business has fallen off in the past, most of the burden of adjustment has been borne by workers and communities. The Air Force should at least be aware of such situations, and could help prevent them by planning for a post-production phase.

NATIONAL CATTLEMEN'S ASSOCIATION

P.O. Box 569 • 1001 Lincoln Street • Denver, Colorado 80201 • 303-861-1904

Reply to Washington, D. C. Office 425 13th Street, N. W. • Suite 1020 • Washington, D. C. 20004 • 202-347-0228



March 12, 1979

Carlos Stern, Ph.D.
Deputy for Environment and Safety
Office of the Secretary of the Air Force
Pentagon
Washington, D.C. 20330

Dear Dr. Stern:

This is to present the comments of the National Cattlemen's Association and the Public Lands Council on the draft supplement to the final Environmental Impact Statement on the M-X Milestone II missile system.

The National Cattlemen's Association and the Public Lands Council are opposed to the use of the power of eminent domain to acquire land for such a system and to the withdrawal of a large amount of public land in the West for such a purpose. Enclosed are copies of resolutions on this matter adopted by these two organizations.

Withdrawing perhaps 5,000 square miles for an area security system would have a tremendous impact on land uses and resources and, of course, on local economies. While not as great because less land is involved, the impacts of a point security system also would be substantial.

Unfortunately, the EIS insufficiently analyzed the environmental and econimc impacts of these two land-based alternatives or how such impacts might be mitigated. Little detail was presented on the resource costs of such systems. Little information was given on how water resources and water users would be affected or on how livestock operations, mining and recreation activities would be compromised under either system. The EIS also did not explain how power would be supplied or how private landowners would be affected.

Despite this, however, there can be no question that the Air-Mobile M-X deployment option now outlined in the draft supplement is immensely preferable to the ground-based alternatives. Such a system which would not require large new ground installations obviously would have far fewer adverse economic and environmental impacts.

Moreover, such a system could be easily adjusted to mitigate whatever adverse impacts there might be and to take advantage of advances in weapons development.

We commend the Air Force for presenting this more sensible approach and we urge the Department of Defense to consider the many advantages of an Air Mobile M-X system over the other options presented.

Sincerely,

Ronald A. Michieli

Director, Government Affairs For Land and Natural Resources National Cattlemen's Association

Executive Director, Public Lands Council

RAM: wp

PUBLIC LANDS COUNCIL RESOLUTION

MILITARY INSTALLATIONS

WHEREAS, The Livestock industry is dependent on public lands in the western states; and,

WHEREAS, Many of the public lands states in the west have provided more than their share of lands for defense purposes;

THEREFORE, BE IT RESOLVED, That the Public Lands Council is opposed to the taking of more lands from the western states for the mobile deployment of an MX missile system and/or any additional military installations.

EMINENT DOMAIN (MISSILE SITES)

MX MISSILE SITE (1979)

WHEREAS, A Federal proposal has been made to construct an underground missile site in the high plains;

THEREFORE, BE IT RESOLVED, That the NCA is opposed to the use of <u>eminent</u> domain for the construction of any such missile site.

Private Lands Committee Actio	on Trayed (A)
Resolutions Committee Action	Co Coulter
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A CITIZENS' ORGANIZATION FOR A SANE WORLD

March 7, 1979

SAMSO/MNND Norton AFB, California 92409

To the Air Force:

Staff members in the Disarmament Project of SANE, A Citizens' Committee for a Sane Nuclear Policy, have read the "Air Mobile Draft Supplement to Final Environmental Impact Statement, MX: Milestone II" with considerable interest. Several questions occurred to us and we would appreciate your answering the following points in sufficient detail to clarify your plans for the proposed basing mode, should it be chosen for the MX.

- 1) What is the expected damage, both in casualties and dollars, from Soviet ICBMs or SLBMs on a city of 5 25,000 population, located 5.5 km. from an alert base? On a city of 25,000 population or more located 35 km. from an alert base?
- 2) If there could be 6 12 alert bases per main operating base (MOB), and if there could be 5 8 MOB's, then couldn't the maximum number of alert bases be 96 rather than 70? If not, what are the standards which restrict this number?
- 3) The MOB construction cost is estimated at \$150 200 million. What will this figure be when adjusted from 1977 dollars to 1980 83 dollars, accounting for projected inflation rates?
- 4) The estimated costs per alert base are \$18 million for a new base, \$9 million for a "Co-use Civ," and \$7 million for a "CO-use Mil." Do these figures represent construction costs, or operations costs, or both? If operations costs, over how long a period? Do these figures account for inflation rates?
- 5) Relating to possible FSED states, how much emphasis in choosing a state will be given to areas of high employment? In other words, how will the variable of unemployment be ranked in your decision-making process?
- 6) If California and Atlanta are projected to have energy deficits by 1985, how can these areas be realistically considered for FSED if the Air Mobile projected energy needs will be 480 million kwh?
- 7) If "air quality degradation" is a possible effect in California, precisely what levels of pollution would be produced and how would these effect compliance of air quality standards with federal established safe levels?

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David Cortright, Executive Director

James Wright

8) For the state of California, what effects would an additional 55,300 jobs have on the total workforce, on population increase, use of natural resources, etc.?	40
9) With earnings increased to \$680 million in the aerospace industry, or 3% of the 1975 - 80 change for Los Angeles and Orange Counties, what effect will this have on general wages and prices throughout the counties and the state?	47
10) What would a population increase in Southern California of 10 - 11,000 persons or 10% - 25% of the region's annual population growth mean for the economy, use of water, sewerage, housing, etc.? - Specifically, what are likely projections for housing cost increases due to MX-related in-migrants?	48
11) What would an additional 32 million kwh of electrical energy consumption per year mean for energy rate changes, electricity availability, increased power station construction?	49
12) Specifically, what is meant by "a growth-constraining problem" in terms of water availability in Southern California?	150
Washington: Seattle-Everett area	
13) How is it figured that there will be additional $5,600$ jobs in this area?	51
14) If both NO_2 and particulates "will be slightly increased," how much? How is this figured? What are the comparable safe levels?	52
Atlanta	
15) How "noticeable at a localized level" will be "housing impacts?"	1 53
16) What results will a 4.3 mill. kwh demand produce?	154
17) How much would air quality be degraded? What would be expected levels of ozone increase? What are safe levels?	55
18) What is meant by "nonattainment" designation by EPA?	156
19) How severe are water problems in the area of Edwards AFB? What specific changes will a flight testing program produce here?	57
20) What changes will MX flight testing produce on "nitrogen oxides which exceed the ambient air quality standards?" (p. III-8)	58
21) What steps would be taken to alleviate the low-income housing scarcity which would be exacerbated by in-migration of workers into the Palmdale-Lancaster area?	59
22) It is stated that "construction of an alert base could require up to two square miles (of land removed from public or private use)." And that "new land requirements would probably not exceed an aggregate range of 20 to 50 square miles (although) actual requirements would be determined in	60

FSED." How will it be determined what land will be removed? What remuneration will be allotted for individuals required to leave their property? What will be done to relocate these individuals, and to find them new jobs (if necessary)?	60
23) It is stated that "up to 140 mi ² of prime agricultural land could be required but although exact areas will not be defined until siting studies, the real requirement for prime farmland is likely no more than 20 to 50 mi ² and probably less." When it is decided which farmland and whose farmland will be expropriated, what factors will be paramount in this decision? Please explain the nature of proposed extensive studies of the economic impact of removal of this land upon local, regional and national economies?	61
24) How will it be determined which people of the "average of 10 to 20 people per mi ² in higher population density areas" will be relocated?	62
25) Considering the projected 1986 electrical power reserve margin deficits throughout most of the studied area, and the statement that "This reserve level (14.9 (-0.1)%) is considered too low for reliable and adequate power supply" what is the basis for judging the Air Mobile plan as outlined to be practicable? How do you anticipate making up for this power deficit both for your needs as well as for those of surrounding communities? If additional and rapid construction of power facilities will be required, how will this expansion be financed? What procedures will be instituted to include viewpoints of local residents?	63
26) In a discussion of "Public Safety" (IV-53-54), it is stated that "Public Safety concerns involve the potential hazards which may result from MX activities and the public perception of that hazard." Could you please detail what the real hazards are of "the proximity of the MOBs to high population density areas" and of "the greater number of flight operations at the MOB for transportation of fuel, missiles and missile components, plus the greater extent of storage and handling of these materials?"	64
27) It is stated that "Strict adherence to the nuclear safety design criteria and explosive safety standards will ensure elimination and control of actual hazards to the public." What are the "nuclear safety design criteria and explosive safety standards" which you mention? Who sets these? What is their validity for densely populated areas near MOB's as opposed to isolated areas?	65
28) When you state that "The relatively low impact potential (of petroleum, oil, and lubricant use) is due primarily to the availability of POL to military users," you neglect to mention precisely what quantities of these materials you expect to use. Please do so and explain how your consumption of petroleum products will compare with a) the projected consumption patterns or average of local residents for the same time period, b) the projected national consumption patterns or average for the same period, andc) the projected consumption average of MOB's and alert bases relative to these bases before their conversion to Air Mobile MX facilities.	66
29) You state that "Economic impacts, though generally beneficial to the local job seekers are tempered by the possible inflationary effect where the project demand exceeds the local labor supply." However, nowhere in the EIS	67

is there any detailed discussion of the inflationary impact of the Air Mobile system on either local or regional economies, nor on the national economy. Please explain what inflationary impacts there are likely to be if this project proceeds into FSED and beyond.

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30) Why, as stated on IV-81, will "assessment of safety design and the elimination and control of hazards" be addressed as part of FSED, and not sooner? Why is it cost-efficient to proceed into FSED when potential safety problems could slow down or foreclose the program at a later date? What provision is being made to alert local communities to safety hazards prior to FSED? Will local communities have access to information on safety hazards in order to make informed judgements about the desirability of MX Air Mobile bases near their homes?

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31) You state on IV-87 that "in-migrants require new housing and additional public services thus straining the local government budgets and the small economies of such (sparsely populated) areas." Does this mean that the local communities will pay twice for MX -- through federal taxes and through increases in local taxes, prices of consumer goods, housing, scarce resources, etc.?

69

32) In IV-105, you state that "Impact potentials are further reduceable by siting MOB in areas with large economies and avoiding areas with small economies." By this, do you mean that MOB's should be located near areas of larger population concentration, larger industrial and/or agricultural production, or larger regional market importance? What effect will making these areas targets for nuclear attack have on the economies, politics and security of these areas? Is it really Pentagon intention to make more people targeted by nuclear missiles rather than fewer people? If so, how does this concept enhance the security of the people living in these areas?

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53) On page IV-111, you state that "Revenues lost to local governments because currently taxable land is removed from the tax rolls will be irretrievably lost." Assuming that large numbers of in-migrants in some areas will be "straining the local government budgets," how do you propose that local governments will replace lost revenues? Tax increases? Deficit spending? More federal aid? What effects will such measures have on local, regional, and national inflation? On the level of existing spending deficits?

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We look forward to receiving your reply as promptly as possible. Thank you for your cooperation.

Sincerely,

Mike Mawby

Disarmament Coordinator

Jeff Phillips Staff Associate

cc: Deputy for Environment and Safety
Office of the Secretary of the Air Force



by Ansel Adams in This is the American Earth

SIERRA CLUB

330 Pennsylvania Avenue, S.E.Washington, D.C. 20003(202) 547-1141

7 March 1979

Carlos Stern, Ph.D.
Deputy for Environment and Safety
Office of the Secretary of the Air Force
Pentagon
Washington, D.C. 20330

COMMENTS ON DRAFT SUPPLEMENT TO THE FINAL EIS ON M-X MILESTONE II

The Sierra Club's earlier comments on the M-X:MILESTONE II (in a letter dated 1 September 1978) noted that in terms of environmental impacts and impacts on land-use patterns and values, the major choice shown was between area and point secruity systems. The former would totally withdraw an area of more than 5000 square miles from any public use, while the latter system would withdraw less land though no less impressive an area would be impacted by road construction.

Air Mobile M-X deployment is an additional option with potentially far fewer impacts on the public lands and public land users than any ground-based, multiple-protected-site (MPS) system.

In our opinion the Draft Supplement describing the Air Mobile system says far too little on the comparison of environmental and economic impacts of deployment for air versus land based systems. This is an important contrast and should be emphasized. While the MILESTONE II decision concerns engineering and development rather than deployment, it is quite clear that the lines along which development proceeds will in fact determine which basing mode will be proposed for deployment. And this will be the crucial determinant of the envionrmental impact of M-X deployment.

While there was little qualitative difference between the impacts of deployment of the various different land-based systems, there is a vast difference in likely impacts between the land-based and air-based launch concepts. The Sierra Club feels strongly that these environmental factors should be considered in any decision to pursue further development of an M-X system.

The negative impacts of deployment of any land-based system would be enormous--greater, perhaps, than those of any other defense project ever proposed. Particularly disturbing to conservationists and to public land users is the requirement for huge acreages of previously undeveloped lands. This concern has been sharpened by the Air Force's lack of ability or willingness to respond to inquiries about the exact mechanisms by which the Air Force would acquire such lands, and how such mechanisms would relate to

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7:

present and future land-use planning by the Bureau of Land Management or other | 73

Each land-based option requires enormous amounts of land, water, and other resources. The Air Mobile option, on the other hand, is vastly more flexible and offers many different opportunities for mitigation and minimization of environmental and economic impacts in its deployment design.

We urge the Air Force and the Department of Defense to consider this flexibility as an additional advantage of an Air Mobile M-X system, to make this advantage explicit in its planning documents, and to give it significant weight in the decision on whether to develop an air or a land-based M-X ballistic missle system.

Sincerely yours,

Russell Shay

National Conservation Staff

RESPONSE TO COMMENTS FROM NATIONAL ORGANIZATIONS

37. The Air Force does not agree that the consequences of a nuclear war are somehow made more severe upon the citizens of the United States by the existence of a MX system than without it. Furthermore, the Air Force has not chosen "to completely ignore this dominant impact." In fact, analyses made in recognition of the threats to the nation of a nuclear war show that these dangers are likely to increase. This determination, that the value of our present strategic systems to deterrence is eroding, is the very reason why a system such as MX is proposed.

Specifically, the Soviet Union has the potential to strike, through the multiplication and refinement of nuclear weapons, a high percentage of our intercontinental ballistic missile force. As a counter to these developments and as a means of preserving no more than an equivalent of our present ICBM force-loading, the Air Force is considering the MX system. The MX alternatives seek to preserve this form of land based missile status quo through the establishment of location uncertainty. Uncertainty makes targeting of our missiles extremely difficult for the Soviet Union, thereby serving as a strong deterrent to an attack on our missile force. Therefore, the danger of nuclear war becomes less, not greater, with the MX system.

The comment implies that NEPA requires the Air Force to do an environmental analysis of, presumably, all levels of nuclear war and that this analysis should be a fundamental document in the decision whether to develop the MX system. We consider that NEPA should not be interpreted to require deep analysis of speculative events rather than recognized and quantitative environmental consequences of a proposed action. Moreover, the Air Force does not have to further study nuclear war to claim unequivocally that it would have catastrophic impacts upon the United States whether or not a MX system is deployed. The Air Force considers this EIS sufficient to help make decisions on FSED work and that the EIS's which will precede site selection and production-deployment decisions, will be likewise sufficient to meet the letter and spirit of NEPA.

Of course, the Soviet Union could respond to a U.S. MX system with a similar system of its own, but whether a mirror reaction to U.S. actions would best serve Soviet strategic purposes is a matter of pure conjecture. To claim that this proposal would fuel an arms race ignores the possibility that SALT II will effectively limit both side's missile deployments quantitatively and qualitatively. In any event, considerations such as this surely go beyond the purpose of NEPA. They are not, however, considerations ignored in the decisionmaking process. The overall arms control implications are considered in the Arms Control and Disarmament Agency's documents available to Congress and to the Executive Branch.

With respect to studies, reports, and recommendations of the Defense Science Board, and other consultant groups all have been taken into account in establishing the array of alternatives and options to be studied as means of preserving the land-based missile force. Further consideration of air mobile options, the purpose of this Supplement to the MX Milestone II EIS, is a direct result of the consideration of study groups and advisors, many of

them outside the Air Force.

The following answers equate with the numbered comments:

I. The Air Force cannot comment on "whether the Soviets would consider an attack on (alert) bases as an option in nuclear war." Soviet war plans cannot be accurately nor confidently anticipated, but, we can predict with some confidence that, given the known capabilities of U.S. and Soviet strategic forces, the Soviets are hardly likely to attack knowing success is improbable. This situation is the essence of deterrence.

If deterrence fails the effects of a nuclear war would be no less devastating on the population of the central United States if an air mobile MX is never deployed.

II. The dangers of nuclear accidents or incidents are probably no greater with air mobile alternatives than they would be with MPS alternatives. This is so because the aircraft with a nuclear-armed missile would never be flown under normal peacetime conditions. (See also response number 74.

III The Air Force believes that the level of consideration of the effects of inflation has been sufficiently covered in this EIS. Without specific knowledge of which particular aerospace companies might be MX prime contractors and even less substantial information on subcontractors, the Air Force cannot now perform the details of analysis suggested.

IV Just as the costs and effects of spending on a yet undefined system under contract to so far unidentified private companies cannot be considered in more detail in this EIS, neither can the Air Force predict the economic conditions of the aerospace industry where the post-MX manufacturing impacts might be felt.

38. A more detailed analysis at specific locations will be presented in the Deployment Area Selection EIS. The MX: Milestone II FEIS and the Air Mobile Supplement identified these impacts to the level of detail necessary for an informed decision at FSED.

39. We expect MX deployment to deter nuclear attack on the United States; therefore, we do not expect any damage to towns or cities. However, if deterrence fails the damage to cities in the vicinity of probable military targets in the United States -- of which air mobile bases would be a small part -- cannot be determined accurately. Nuclear effects depend upon the number of weapons applied to a target, weapon yield, height of burst, fallout patterns and many more variables.

40. The number of bases shown in the Draft Supplement is a preliminary estimate. Current estimates show a need for about 6 main operating bases and about 40 alert bases. MOBs may support a variable number of alert bases.

41. Assuming a 7 percent annual inflation rate, \$200 million (1977 dollars) would equate to about \$300 million in 1983 dollars.

- 42. The data presented are construction costs. Operational cost estimates for alert bases are not yet known.
- 43. Major defense contracts are generally awarded on a competitive basis considering cost, technical competence of potential contractors, and other factors. Insofar as localized high employment causes skill shortages and consequent high labor costs, some contractors may be less competitive than others. Government procurement plans also consider labor surplus areas (areas of high general unemployment). However, rates of unemployment are not customarily a primary contract award consideration.
- 44. The MX common energy consumption (480 million kwh) represents an extremely small portion of the total energy demand of these areas. This energy would not be consumed in one location, but distributed in increments over all the areas in which contracting firms were located. Figure 1-1, chapter II of this Supplement provides perspective on the distribution of the aerospace industry.
- 45. Precise levels of pollution generated during FSED depend upon where contracts are awarded and what work is performed at each location. This information is not known at this time. Both private contractors and the Air Force, however, must comply with State implementation plans which are designed to achieve compliance with Federal air quality standards.
- 46. The impacts of the incremental employment in Southern California associated with MX FSED on population, work force, air and water quality, etc. are discussed on pages II-19, II-20, and II-22 of the Draft Air Mobile Supplement.
- 47. The effect on wages and prices in Southern California and in the state as a whole of the increased earnings associated with MX FSED will depend on the 1980-83 level of economic activity and unemployment rates in the region and the nation as a whole. Definitive analyses of projected general wage and price levels in Southern California would be too speculative at this point.
- 48. The impacts of MX FSED-related population inmigration into Southern California are discussed on pages II-19 through II-22 of the Draft Supplement. Projections of changes in housing costs resulting from this level of inmigration would be dependent on the specific residential location choice of the inmigrants and on the housing supply and demand characteristics of the specific areas of Southern California where the inmigrants choose to obtain housing.
- 49. The additional 32 million kwh of electric energy required for FSED in California would be equal to about 0.025 percent of California's electricity production in 1975. No rate changes or power station construction in California would be expected as a result of this increased demand.
- 50. Most water used in Southern California is imported into the area. The availability of imported water is constrained by drought conditions in the source areas. These conditions vary from year-to-year. In several instances in Southern California, growth is constrained through the use of

moratoria on water hookups or penalties for over-use.

- 51. The methodology for estimating output earnings and employment impacts is given in Addendum II-B page II-131 of the MX: Milestone II FEIS.
- 52. The increase in NO_X and particulates in the Seattle area would be negligible. This is based on a population increase of 3,700 persons against a population of at least 1,522,000 or about 0.02 percent population increase. The National Primary Standards for NO_X (100 $\mu g/m^3$) have not been exceeded, based on 1976 EPA data. Particulate concentrations exceeded the National Standards on one occasion in 1976.
- 53. Assuming that most workers would like to live as close to their work as possible, the impacts on housing will be relatively greater in the close proximity to the plant site and will decline gradually as the distance from the site increases. Since the location of physical plants is not yet known, specific impacts cannot be measured at this time, but will be discussed in subsequent studies.
- 54. The additional 4.3 million kwh of electric energy required for the FSED in Georgia would be equal to about 0.0098 percent of Georgia's electricity production in 1975. No rate changes or power station construction in Georgia would be expected as a result of this increased demand.
- 55. Air quality in the Georgia Atlanta region would not be significantly degraded since we expect only a 0.08 percent increase in population of the region (1600 increase in a projected 1980 population of 1.9 million). The concentration of ozone from this small population increase is expected to be non-measurable. The national primary standard for ozone is $210~\mu g/m^3$ for one hour.
- 56. EPA has defined non-attainment as exceeding a national air quality standard for a specified pollutant for a given time duration.
- 57. There would be a marginal change in area water needs due to the 920 in-migrants projected to be required for the flight testing program. However, this would form less than 0.5 percent of the area's projected population (p. III-41 of the Draft Supplement) and the effects on additional water consumption are considered to be negligible.
- 58. The effect of MX aircraft flight testing on nitrogen oxide concentrations at Edwards AFB would be minimal. The contribution of the flight tests would amount to only .23 .35 percent of the annual Kern county nitrogen oxide pollution. These emissions are based on projected fuel consumption per year associated with 1,000 to 2,000 flight hours.
 - 59. See paragraph 3.2.2.3.3, page III-41 of the Draft Supplement.
- 60. As indicated in the Air Mobile Supplement, it is the Air Force's intention, if the Air Mobile deployment concept is selected, to avoid development of now alert facilities to the maximum extent possible, and instead to maximize co-location of alert bases with existing military and

civilian airfields. Co-location of alert bases would minimize the amount of land that would be removed from alternative uses. Site selection activities, performed during FSED, ultimately will lead to the determination of specific land requirements in specific locations. These issues will be covered in the Deployment Area Selection EIS, if Air Mobile proceeds into FSED.

It is Air Force policy to avoid use of private land wherever possible. Where the requirement to purchase private land is unavoidable, a fair market price will be negotiated with the owner of the property. Pursuant to public law, funds will be available to provide relocation assistance to displaced residents.

- 61. If existing airfields require expansion, immediately adjacent land is most likely to be required for extension of runways or clear zones. In such cases, very little flexibility exists. We anticipate, however, that no additional land will be required at most MOB or alert base locations. If the air mobile option proceeds into FSED and site selection process initiated, a Deployment Area Selection EIS will be prepared to address, among other issues, the impacts on local, regional, and national economies.
- 62. People relocation will be minimized, however it may not be totally avoidable. Which people might be relocated would be determined primarily on the basis of siting considerations.
- 63. The MARCA region is projected to have an electrical energy shortage whether or not an air mobile option is selected. This assessment is based on: Federal Power Commission, Bureau of Power Staff Report, 1977; Electric Power Supply and Demand, 1977-1986 as projected by the Regional Electric Reliability Councils, May 16, 1977; National Electric Reliability Council, 1978; 8th Annual Review of Overall Reliability and Adequacy of the North American Bulk Power Systems, August 1978.

The projected 1986 peak demand for the region is 28,900 MW. MX Air Mobile, if deployed in the region would add 200 to 400 MW to this amount depending on the number of MOBs, number of alert bases both in the area and in the entire system. A solution to the energy shortage problem would have to be developed whether air mobile deployment occurs in the area or not. The most appropriate means of supplying required electrical energy would be studied in detail during FSED.

- 64. The "real hazards" associated with Air Mobile MX operations at a MOB are not significantly different from those of normal operations at any existing large air base. Although the quantities of fuels, propellants, etc. would be greater, the same types of precautions would be taken to assure that the operations would be safe to both military and civilian personnel, property, and equipment. Hazards associated with the operations would be eliminated or controlled and would not be affected by where the MOBs are located. (See also our response number 74 for additional detail.)
- 65. Nuclear safety design criteria are contained in Air Force Regulation 122-10. This regulation specifies the critical weapon functions which must be controlled to minimize the probability of inadvertent nuclear detonation, accidental launch, or deliberate unauthorized launch. It also specifies the security measures which must be taken to protect the weapon.

It assigns quantitative requirements against the accidental activation of certain critical weapon functions; analyses will be conducted during FSED to assure

that these requirements are met. Prior to fielding of the weapon system, the design and operating procedures will be studied by the Nuclear Weapon System Safety Group (NWSSG) to assure that the weapon system can be safely operated and maintained. This group also prepares the nuclear safety rules which specify the constraints under which the system must be operated. These rules must be approved at DOD/DOE levels.

Explosive safety standards are contained in Air Force Regulation 127-100. This regulation contains standard explosive safety practices which have been evolved through years of experience to minimize the probability of an explosive accident. It also specifies facility siting criteria (minimum distances from explosive storage/operating locations to public highways, inhabited buildings, etc.) to minimize the effect on the public in the unlikely event of an explosive accident. The standards apply and are valid for the MOBs near highly populated areas and alert sites in isolated areas.

- 66. The amount of fuel required to operate an air mobile MX force in peacetime depends upon several variables not yet decided, such as force size, aircrew training rates, alert aircraft ferrying rates, characteristics of the operational aircraft and other factors. These uncertainties would be reduced if the air mobile alternative proceeds into FSED. The Air Force estimates, however, that air mobile fuel requirements for aircraft operations would be from 200 million to 300 million gallons a year. We cannot compare these numbers with the petroleum consumption rates of individual citizens, rates which vary widely depending on occupation, availability of public transportation, and so on. We do know, however, that air mobile fuel requirements could be equal to about 2 percent of the yearly use of fuel by all U.S. airlines.
- 67. The inflationary impacts of MX FSED as well as possible future program phases are dependent on actions taken by Congress and the President regarding the total size of the Federal budget, and on program priorities within the budget. Local and regional inflationary effects also will depend on local levels of economic activity as well as regional unemployment rates at the time the funds are committed.
- 68. It is not possible to thoroughly assess safety design or to identify and eliminate or control hazards of the MX air mobile system except by actually pursuing such studies in detail during FSED. The air mobile supplement itself alerts the public to the possible existence of hazards associated with the system. No detailed study of candidate deployment sites for the elements of the system has been performed. This would be accomplished and affected communities would have the opportunity to comment during the preparation of the Deployment Area Selection EIS.
- 69. Detailed analyses of impacts on housing and public service costs caused by inmigration associated with deployment of MX (regardless of which basing mode is selected) are beyond the scope of this document. The Deployment Area Selection EIS, however, would consider the economic, housing and public services impacts of MX deployment (in terms of the basing mode that is selected for FSED).

- 70. As noted in the Supplement, the Air Force plans to use existing major military bases as MOBs for air mobile MX. To the extent that the bases selected are already strategic military facilities, they are assumed to be of strategic importance to the Soviet Union. Thus, there should be no significant change in potential risk to these areas.
 - 71. See answer to Questions 67 and 69.
- 72. There can be no question that comparison between air mobile and ground mobile alternatives should be made. It is just as certain that these same environmental and economic impacts should be looked at in even more detail; say, for example, between the vertical shelter and hybrid trench options within the MPS alternative. The Air Force has made these comparisons insofar as the pre-FSED data base allows, using 14 specific environmental variables of concern. These same variables are used for all alternative basing modes, and the presentation of the data allows comparisons variable-by-variable and in terms of a single, aggregate figure of merit.

It is true that there are differences between the physical impacts comparing the several air and MPS alternatives, but it cannot be, therefore, concluded that one system might be more environmentally appealing than another. The Air Force and the Defense Department will, of course, weigh and balance environmental consequences in the decisionmaking process, but the balance must include--perhaps even give more weight to--factors and considerations external to the EIS process. The most fundamental of these is the operational requirement; that is, will the system perform the military mission? In addition, the mission performance per dollar expended, the cost of operating a MX system over its lifetime, the cost of obtaining confidence in the differing technical demands of the options and several other equally important financial considerations have what may appear to be a disproportionate weight. But the MX system could be, as you observe, one of most costly defense projects ever proposed. Nevertheless, military need does not cancel out cost-consciousness any more than it can or should outweigh the impact upon the physical environment. The Air Force is committed to finding the proper balance between what it must do for military reasons and for what we want to do to otherwise protect the citizens of the United States.

73. The Air Force has not been unwilling "to respond to inquiries about the exact mechanisms" which might be used to obtain the land a deployment mode choice could eventually require. In fact, these mechanisms are those described in law and observed in practice by all agencies of the Federal government. We are well aware of the concern our deliberate pace has caused among citizens in those parts of the United States which have been looked at in a preliminary way for possible siting areas. We have informed these citizens that the purpose of EIS work so far is to aid decisionmakers with respect to FSED. Environmentally, indeed operationally, FSED impacts fall largely on the Vandenberg Air Force Base area in California, but we have illustrated in the EIS some of the eventual results which might follow successful FSED. One of the principal investigative areas of FSED is to decide details of basing and in particular to investigate more fully possible basing areas for the system. This investigation involves, of course, a full EIS, including scoping and all the

requirements of the CEQ Regulations, but it also includes the geological and other surveys needed to support withdrawal requests for public domain land if such withdrawals are found necessary. The law and our own regulations require attention to the concerns of land-users, land-use planners, and land owners. The Air Force respects these concerns and insofar as it is possible will accommodate them.

STATE AND LOCAL ORGANIZATIONS

Nebraskans for Peace 430 South 16th Street Lincoln, NE 68508 March 9, 1979

Dr. Carlos Stern
Deputy for Environment and Safety
Office of the Secretary of the Air Force
Room 4C885, The Pentagon
Washington, D.C. 20330

Dear Dr. Stern:

Nebraskans for Peace is a statewide organization. Our members vary widely in age, vocation, and religious conviction; what we hold in common is a commitment to future generations—to their security, their health, and their existence.

We are deeply concerned to find that the public's safety has been inadequately considered in the "Air Mobile Draft Supplement" to the MX Milestone II Final Environmental Impact Statement. Until and unless an adequate analysis for safety is completed, we believe, the MX should not proceed to Full Scale Engineering Development. Since Nebraska is a likely location for the air mobile MX, as shown on the maps on pages IV-5 and C-4, this omission directly affects us.

Our first and most basic question about the "Air Mobile Draft Supplement is:

1) What are the risks, the actual, measurable, predictable risks to the public over the years this system would be in operation?

74

The air mobile MX proposes to use civilian airports for planes carrying nuclear weapons. Common sense says the first questions to be answered pertain to air crashes and collisions resulting in public exposure to radioactive materials. The "Air Mobile Draft Supplement" says that "Public safety concerns involve the potential hazards which may result from MX activities and the public perception of that hazard" (IV-53); however, the study examines only the second half of its own definition.

A framework of quantifiable standards is employed for every other environmental factor considered, with the possible exception of "aesthetic degredation", for example, in Table 3.1-1 (IV 27-30). For "air quality" it considers dust concentration, for "economics," the lost agricultural production, for "local government," the number of new housing units required, and so on. However the indices for "public safety" list "nuclear target concern" and "nuclear accident concern," thus shifting the question from an estimate of risk to which the public would be exposed to a question of what anxiety people might experience, whether from real or imagined dangers. So we ask:

76

2) Does the Air Force believe that it is not possible to estimate the risks to the public of the air mobile MX?

A methodology for assessing risk was suggested by the Air Force response to our previous questions about the danger of a plutonium spill on public roads used to transport nuclear missiles under the point security, multiple protective structure MX plan. The reply said: "In the history of our ICBM forces, there have been transportation vehicle accidents. There has never been a 'nuclear spill' as a result thereof."

- 3) Relying on the histories of both our airborne nuclear forces and civilian airlines and airports, would it not be possible to assess, similarly, the number of accidents for the number of miles flown and for the number of takeoffs and landings?
- 4) Could not these figures and other relevant data be compared to an estimated use of the aircraft, main operating bases and alert bases for each of the air mobile configurations over the expected life of the MX?
- 5) Does the Air Force assert that it is not required in this environmental impact statement to evaluate public safety with the best information available, but rather, can defer a safety analysis to sometime in the future?

Following are three quotations from the "Air Mobile Draft Supplement." Since the key words, "elimination" and "control" of hazards, are so vague as to be meaningless (What, precisely, are controlled hazards? How hazardous are they? Can all hazards really be "eliminated"?), the central message these statements carry is that safety can be largly ignored for now, but perhaps could be addressed in the next impact statement, or the next:

"Thorough analysis of safety design will be carried out as a continuing part of FSED. Strict adherence to the nuclear safety design criteria and explosive safety standards will ensure elimination and control of actual hazards to the public." (IV-65)

"The hazards will be eliminated or controlled by strict adherence to nuclear design safety criteria." (IV-54)

"Continuing assessment of safety design and elimination and control of hazards will be addressed as part of FSED." (IV-81)

We cannot argue with the assumption that better information could be developed in the Full-Scale Engineering Development phase. The best information, of course, would be available at the end of the MX' thirty-odd year lifespan, but that is a bad argument for delay until all the facts are in.

Since Congress has declared that the public shall be informed of the major environmental consequences of projects such as the air mobile MX, it appears to us that in the "Air Mobile" draft impact statement, the Air Force has evaded its legal responsibilities. We believe the public is owed a full evaluation of the risks of this project at this stage of its development.

80

6) Is the absence of information on the public's safety in this document a reflection of the Air Force's fear of informed public opposition to the air mobile MX?

We have considered every reference to public safety in the "Air Mobile Draft Supplement" and can find no evidence that the Air Force has attempted to make even the most superficial analysis of the dangers to the public. But we cannot conclude that the Air Force believes that the impact of this project on the public's safety would be non-existent. The following statements acknowledge that there would be some effect, and that safety can be measured, at least in terms of "lesser" or "greater":

"The proximity of the NORS to high population density areas will also increase the potential hazards associated with MX activities. The greater number of flight operations at the MOB for transportation of fuel, missiles, and missile components, plus greater extent of storage and handling of these materials will result in greater hazard potentials at the MOBs than at the alert bases." (IV-54)

"Depending upon public response to the project, the perceived hazard may be greater than indicated by an objective safety analysis." (IV-53)

Either the "objective safety analysis" referred to is hypothetical, or the Air Force has chosen not to share it with the public. Either possibility could explain the chart (IV 109-110) for short term and long term effects of a dozen environmental impacts which shows (only) the columns for impacts for "Safety" as completely blank.

7) Is the absence of information on the sites analyzed in Chapter IV of this document a reflection of the Air Force's fear of informed public opposition to the air mobile MX?

Although "specific study areas" (IV-4) were used in the "Air Mobile Draft Supplement, their geographic location was not identified, as were the analogous sites in the impact statement for the Multiple Protective Structure options. Therefore, we believe, no fair comparison of public response to the various basing modes can be made on the basis of these impact statements.

It is no secret that the mostly negative responses of some 2500 Nebraskans to the earlier impact statement have had some effect on MX planning. Is the Air Force now attempting to avoid a similar "sociopolitical controversy detrimental to the project" (IV-87) by not informing the people of Nebraska what is being considered for the future of our state?

Recently, our newspaper quoted Undersecretary of Defense Dr. William Perry, responding to Nebraska Congresswoman Smith, as saying "he did not think it was necessary or desirable to locate the MX in productive agricultural areas." (Lincoln Journal, 2/7/79) The story, headlined "Nebraska MX Site Unlikely," continued: "Meeting in Mrs. Smith's office, Perry

indicated the issue could become moot since MX air deployment was under 'serious consideration.'"

Yet in this new impact statement, we find a map (IV-5) which shows much less land in Nebraska than in any other state in the "project area" being excluded from MX siting for reasons of altitude, population, land use in parks or Indian reservations, etc. In other words, more Nebraska land is suitable for the MX, it would appear from the map. A second map, in Appendix C (C-4) shows western Nebraska and Kansas as having the largest contiguous area of "low sensitivity"--which transla tes into land most desirable for the air mobile MX. If, as these maps indicate, Nebraska is again being considered as a site for the MX, we believe the people of this state have a right to know about it, now. Therefore, our last question is simply this:

> 8) Is any part of Nebraska under any consideration as a site for the Air Mobile MX?

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Thank you very much for your attention to our concerns.

Sincerely yours,

Reverend David McCreary President, Nebraskans for Peace

Row. David M. Creary

Marilyn McNabb

Chair, MX Taskforce

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RESPONSE TO COMMENTS FROM STATE AND LOCAL ORGANIZATIONS

74. It is not possible to predict the exact risks to which the public would be exposed as a consequence of deployment of an air mobile MX system. Furthermore, the MX aircraft with a missile but no nuclear weapons aboard would fly very infrequently during transport between MOBs and alert bases. Normal training flights would not be conducted with a missile aboard. However, a dummy load could be carried to simulate an actual missile weight.

In short, most MX aircraft would fly very little, rotating between alert and main operating bases a few times a year. Resupply and personnel support missions might be flown a few times a day to each alert base. These flights could be with aircraft similar to the missile carrier or with some other type of cargo aircraft. These few flights in support of alert aircraft would make a statistically unmeasurable contribution to higher possible accident rates at alert or MOB airfields, which even today probably host similar flight activities by military and commercial transports.

On the other hand, crew flight training, most of which would be done from MOBs, could raise the level of flying activities at these airfields. The MOBs, however, are already active, and much military flying is done from them. The public in the areas surrounding these potential MX MOBs is protected from some of the consequences of aircraft accidents by runway clear zones, flying procedures avoiding populated areas and so on. These practices would be continued.

Apart from flying accidents, there are other possible risks to which the public might be exposed. The missile aboard an aircraft on the ground at the alert base presents a potential explosive safety hazard. The public would be protected by the establishment of clear zones in accordance with established standards.

Finally, nuclear materials would have to be moved from place to place during the life of the system. The movements would probably be made aboard transport aircraft as nuclear material transfers for other systems are made now. In the past 5 years, the Air Force has made over 1,100 flights totaling 20,000 flying hours transporting nuclear materials with no mishaps resulting in loss or destruction of the weapon or dispersal of nuclear material. There have been no accidents of any consequence involving the transport of nuclear weapons for at least the last fifteen years. Under no circumstances are armed nuclear weapons carried on logistics transfer flights.

- 75. The Air Force does believe that adequate safety analyses have been performed for the Air Mobile concept to make a FSED decision. However, as discussed in response number 68, a thorough assessment of safety design and identification and elimination or control of hazards will be pursued in FSED (see also response numbers 64 and 65).
- 76-77. The history of <u>airborne</u> nuclear forces is not relevant to the air mobile MX because the force will not fly in peacetime with nuclear weapons aboard. There will be no airborne nuclear alert. Therefore,

because the MX is primarily a cargo aircraft, its reliability ratio will be no less than that of civil and military cargo aircraft. The air mobile aircraft is a cargo-type aircraft that would fly a relatively simple cargo-type mission: take off; cruise at altitude; and land (rather than the more demanding missions conducted by bombers and tactical fighter aircraft). Its expected safety performance could be directly comparable to that of cargo aircraft such as the C-130 and C-141, whose safety record is excellent. In addition to their other missions, these aircraft ferry nuclear materials for logistics support. In the five year period from 1974 through 1978, about 1,100 such missions, representing almost 20,000 flight hours, were flown without a single mishap.

- 78. The Air Force has not deferred safety analysis to sometime in the future. Although a complete analysis must await further system definition in FSED, the Air Force has made its best effort with the information available at this time. (See also response number 68)
- 79. The Air Force believes it is its duty to keep the public informed about this project. In fact, the purpose of this MX system EIS and those planned for the future is to give the citizens of the United States as complete a collection of data on the environmental consequences of the MX as possible. Furthermore, one purpose of the comment period is to allow the public to respond. We have responded to these comments and will make them a part of for future decision-making.
- 80. The Draft Supplement clearly indicated the states in which Air Mobile might ultimately be based (Fig. 3-3). This addendum also shows where existing military installations are located within those states. (See response number 86). As stated in the Draft Supplement, the Air Force would use existing facilities as much as possible. Some new facilities, however, may need to be built.
- 81. See response number 80. If air mobile is chosen as a basing mode and air mobile moves into FSED, site planning will begin. At that time, specific sites in Nebraska will probably be under consideration for the Air Mobile MX.

INDIVIDUALS

New Soi:

I abordately office the \$2.2 tillion supplemental hudget for the 2 new 1 CBM-MX experimental missile whose deployment would require 4000 missile whose deployment would require 4000 missile whose deployment would require for the form above, the will soon square including for amount alone, plus the Intie Mohare disentand many other minetal sites. He USA aboutly has deal feel an cusione amount of overlieb. This project would keeping his country.

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Dr. Carlos Stern
Deputy for Environment and Safety
Office of the Secretary of the Air Force
Room 4C885
The Pentagon
Washigton, D.C. 20330

Dear Dr. Stern:

Thank you for continuing to keep me informed as to the status of the MX; Milestone II.

In review of the Impact Statements for the proposed Air Mobile system, as well as the previous system proposals, several questions arise concerning the implementation of the proposals. Notwithstanding the obvious question of whether such a defense system is actually necessary, consideration of whether this is a desirable use of America's resources is crucial in any decision.

All of the systems under consideration require the condemnation of agricultural lands, and in predominately the midwestern states. The necessity for maintence of our food supply systems can not be overemphasized and any proposal that requires the destruction of large areas of agricultural lands should be immediately withdrawn from consideration.

I would like to respond to a reference made to Sensitive High Agricultural Output Areas (Air Mobile IV-15):

"High agricultural value areas are defined as areas which have a market value of agricultural products sold per acre of \$100 or more (Figure 1-9). Such areas are considered to be sensitive because there is a high dollar cost associated with the purchase of highly valuable agricultural land, and a strong argument can be made that high value agricultural land should remain in agriculture as the best use of that land."

The above statement does not adequately reflect the agricultural situation. According the figure 1-9 (Air MobileIV-18), Yuma County, Colorado, of which I am a resident, produces from \$50-99 per acre of agricultural products. The recently released Colorado Agricultural Statistics indicate the high productivity of this area. In relation

82

to the other counties in Colorado, Yuma county is ranked in the following manner:

Product	Ran
Corn for grain	1
Corn for Silage	3
Grain Sorghum	4
Sugar Beets	5
Hay	5
Cattle and calves on farms	4

82

In addition to these top ranking products, Yuma county produces over 3 million bushels of wheat. The production in Yuma County is indicative of the production in the surrounding areas in Colorado and Nebraska. The midwest is a tremendous food producing area, and it would be disastrous to withdraw these lands from production. With the above facts in mind and also considering the tremendous social-economic impacts of such a system, I urge you to withdraw from consideration the condemnation of these agriculturally important lands.

In reference to the air mobile system, I am concerned about the large impact on public safety. If such a project is going to endanger the citizenry, then provisions must be made to alleviate the danger or the installation should not be built. I would appreciate a further explaination of the nature of the public safety problems.

83

My primary question is - why do we need such a system as the M-X? The ground based missle proposals (i.e., buried trenches, vertical shelters, horizontal shelters, and pools) verge on the point of absurdity and the added defense capabilities appear to be only minimal for the tremendous cost that must be borne by the American Citizens. The air mobile system appears to be considerably less expensive and less susceptible to obsolescence but, I could not condone the building of the air mobile system on these two premises.

84

I shall await your response to these questions and I would ask that you continue to keep me informed on matters pertaining to the M-X missle.

Sincerely.

Tim Buchanan Wages Route

Yuma, Colorado 80759

. lin - She home

4435 Brinder LE Law Diego, California 92107 January 28, 1979

Office of the linetry, USAF (SAF/MIQ)
Pentagon! Washington, D. C. 20230
Dearlie:

The way to stop the terrible wheat of a nuclear wer to destroy all life on earl in to stry the perduction of weapons that will promote rul a war. The way to stop is to stop. The first more to start to stop is to stop MX, both link and new models. The object of our military force and strategy whomes he to reduce the weight of any potential attack on U. I. real externache than attracting even more! The only reason for MX super accuracy is to hill herity encoul concrete and steel silve, and the only resem to rilor is to strike first. Our present enormous and varies stockpile of weapons in girt sufficient to deter any aggresson. Three who run the Pentigon should be made to see ale movie Dr. Strangelove, daily - then perhaps the american scientists could follow perged to improve like on eart, not end it.

Amenely. Marqueite Christoph

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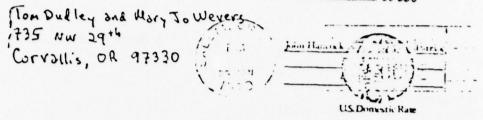
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Respectfully, ardyth Danick

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Mary go Wevers



Deputy for Environment & Safety
Office of the Secretary, USAF (SAF/MIQ)
Pentayon, Washington, D.C.
20230

€ USPS 1978

We are utterly opposed the the entire MX plan. The expense is far too great, esp. considering the funds it takes from social needs. More importantly, the immediate damage to huge ecosystems as indefensible, and grave danger to humanity is deplorable! The present degree of overkill is insome and irrational, but this additional system should be discarded, especially since it is offensive rather than defensive.

Sincerely tour Dudly

5 March 1979

SAMSO/MNND Norton AFB, California 92409

Sir:

The following comments are being submitted relevant to the Air Mobile Draft Supplement:

1. The 20 - 30 air mobile aerial delivery system tests to be conducted during FSED west of Vandenberg at the Western Test Range will have significant biological impact on the known 30 species of North American Whales and Dolphine inhabiting this general area (Walker - 1962). According to Fish and Wild Life Service, seven of those species are threatened with extinction.

The impact would be caused by the large expended parachute/cradle assemblies falling into the ocean and remaining there indefinitely to create a potential condition for these mammals to become entrapped in the partially submerged parachute and perish.

This concern could be dispelled if each of the expended parachute/ cradle assemblies were retrieved and refurbished similar to what is being done with the Solid Rocket Motors (SRM) on the Shuttle Program.

2. The document states that most and preferably all the Main Operating Bases (MOB) and possibly some of the Alert Bases will be sited at existing military airfields. If this is the case, it would have been pertinent information to have depicted the location of those military airfields on Figures 1-1 or 1-2 which are located in the primary and expanded study area.

86

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Sincerely yours,

Eugene E. Johnston

5475 W. Lehigh Avenue Denver, Colorado 80235 Copy to: Dr Carlos Sterm, Deputy for Environment & Safety

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February 9, 1979

Carlos Stern, Ph.D.
Deputy for Environment and Safety
Office of the Secretary of the Air Force
Room 4C - 885
the Pentagon
Washington, D.C. 20330

Dear Dr. Stern:

I received your letter today concerning the Air Mobile basing mode for the MX missile.

As you know, I am completely opposed to taking privately owned land and people's homes away from them for any form of land basing. But I also have many objections to an air-basing mode, most of them concerned with safety.

I would like to know what happens when an airplane carrying an MX missile crashes, as would inevitably happen sooner or later. Does the missile explode at the crash site? Does it leak radiation or noxious fumes? Would it be possible that it might launch itself for some pre-set target? What sort of safeguards are there that none of these things could happen?

87

Another objection is this: the tremendous use of energy in the form of fuel for these constantly-flving transport aircraft. We no longer have vast amounts of fuel to use. Is not this new demand likely to cause shortages and drive up prices?

88

I do not believe that the MX missile is a good idea. It seems to me to be a clear case on our part of escalation in the arms race. It will be tremendously expensive at a time when inflation threatens us, a waste of precious energy and resources, and will likely be obsolete in a short time since, if we develop this, the other side will develop something to counteract it. All the basing methods I have heard about so far have sounded very unsafe. Who will defend us from our own defense system?

Sincerely,

Nancy G. Schaffert

Route 3, Box 54

Curtis, Nebraska 69025

ns

Febr. 9, 1979

Carlos Stern
Deputy for Environment & Safety
Department of the Air Force
Washington, D.C. 20330

Dear Dr. Stern:

This is in regard to the supplements to the EIS, dated Jan. 9 and Jan. 18, which you convieniently saw did not reach the public until too late for comment.

As Deputy for Environment & Safety, I must assume you have some authority over matters concerning the safety of the public. You must also be aware that there is no safe way to handle the MX missiles, the proposed "air mobile" method being perhaps the most valuerable to accidents and sabotage.

What kind of "national security" writes off the health and safety of the public? In a recent interview, Zbigniew Brzezinski stated that an all-out nuclear war wouldn't really be so bad since only about 10% of humanity would die. Presumably that figure does not include the later casualties from radiation sickness. Is this really official policy, to write off casualties, either from war or from accident, as expendable before they occur?

The guilt for the consequences of such a policy rests on <u>you</u> personally, not on the system or on your superiors. It rests on <u>you</u>, no matter how many others share it; it rests on every one of you who failed to do all he could to end this insanity.

I am asking you to give serious thought to what the Air Force is proposing to do, and at what human as well as financial expense. Please for the sake of the civilian public and for our land, water and air, use whatever authority you and your colleagues have to discourage construction of the MX missiles under any plan for a basing mode.

Sincerely,

Mary Schaffert
Mary Schaffert

Rt. 3, Box 54 Curtis, Nebraska 69025 89

Long Pine, Nebraska February 5, 1979

Deputy for Environment and Safety Office of the Secretary, USAF (SAF/MIQ) Pentagon, Washington, D.C.

Dear Deputy:

I am writing to you as a concerned citizen in Nebraska who has been reading, researching, and studying the reality of our nuclear weapons build-up and my fears for the future mount with each article I read. An article in Sunday's Omaha Herald concerning the continuing plans for the basing of the new MX Missles prompted this letter.

I urge you to stop the building of the new MXs and stop the planning for basing them in tunnels beneath our beloved land. Besides the ridiculousness of the games of "holes and tunnels", the playing with lives with continued stockpiling of nuclear weapons is a morally irresponsible direction to take.

I plead with you to do all in your power to stop this unreasonable, if not insane, plan. Thousands like myself know that time for a chance to be reasonable is running out. We won't be given many more chances to say "No" to stopping nuclear power and weapons development. The world is already glutted with nuclear weapons. Our only hope for survival is to get on with peacemaking at conference tables and to guarantee distribution of natural resourses so that people throughout the world can live in dignity and peace.

Please spare sending me piles of papers from the Pentagon outling the need for building up our defense system. I already have stacks of this material and they have not convinced me to change my moral stance.

Thanking you for your attention and response to my letter, I am

Sincerely,

Leter franctic Sulzman, 17. Sister Jeanette Sulzman, O.P.

RESPONSE TO COMMENTS FROM INDIVIDUALS

- 82. The Air Mobile supplement recognizes that agriculture is an important land use in Yuma County and throughout central CONUS. When potential sites are identified and evaluated in the Deployment Area Selection EIS, potential for impact on agricultural lands will be an important criterion.
- 83. The air mobile MX system will not greatly change the hazards to which the public is exposed even around bases which do not now host strategic aircraft. The Air Force's safety record is excellent, and our standards for maintaining it are strict. For example, we do not normally operate high performance aircraft from bases where low flying over inhabited areas is required for takeoffs or landings, ordinarily the most hazardous flight phases. Furthermore, the air mobile concept does not require regular flights of missile-loaded aircraft. It is true, however, that training aircraft, without an actual missile load would fly regularly and frequently from main operating bases. All of these bases would probably be bases which already host large scale Air Force flying activities.
- 84. The Air Force has carefully considered the projected threat to the survivability of our land-based ICBMs and the potential impacts that vulnerability could have on the military balance, world stability and our national security. It has been concluded there is a valid requirement to preserve the unique and essential contributions that ICBMs make to the Triad concept, preservation of peace and deterrence of global conflict. Of the alternatives which have been examined, deployment of MX in modes that maintain location uncertainty were judged to be the best alternatives to fullfill national policy and defense objectives.

Making national defense decisions of the magnitude of MX is not done in isolation by the Air Force. It is a very complex process involving many other participants such as the Department of Defense, the Congress, the President, and the American people. Many technical, political, economic, and environmental factors must be considered; therefore, it is quite natural that many divergent views are voiced on what our defense needs are and the best way to satisfy those needs. The total picture including the Air Force proposed action, alternatives and opposing views, will be considered by our elected representatives and leaders before a decision is made on whether or not MX should proceed into the next stage of development.

- 85. We have planned retrieval of extraction parachutes and cradle assemblies as part of the test procedures to be used following a flight test of the Air Mobile MX missile at Vandenberg AFB. Retrieval will be undertaken as soon after the flight test as possible. This procedure was identified as a means of improving resource efficiency and lowering overall program costs and should significantly reduce risks to whales.
 - 86. Please see map on page 160.
 - 87. See response number 74.

- 88. See response number 66.
- 89. The development of the MX system with its basing mode alternatives is to deter any thought of nuclear attack to our nation. First and foremost in all of our minds is the preservation of humanity.

